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ABSTRACT

This publication is a comprehensive record of testimony and exhibits presented to the Subcommittee on Elementary, Secondary, and Vocational Education of the Committee on Education and Labor of the U.S. House of Representatives during hearings on H.R. 15, a bill to extend for five years various federally funded elementary, secondary, and other education programs. The hearings were conducted on July 21, August 3, and August 4, 1977 and focused in turn on 1) the planning and evaluation of elementary and secondary education programs conducted by the Department of Health, Education, and Welfare (DHEW), 2) the administrative structure established by DHEW for the implementation of elementary and secondary education programs, and 3) the operation of legislatively required advisory councils for programs administered by the Office of Education. Testimony and exhibits are presented chronologically and indexed alphabetically by witnesses' names. (JG)

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PART 10: ADMINISTRATIVE ISSUES

HEARINGS

BEFORE THE

SUBCOMMITTEE ON ELEMENTARY, SECONDARY AND VOCATIONAL EDUCATION

OF THE

COMMITTEE ON EDUCATION AND LABOR
HOUSE OF REPRESENTATIVES

NINETY-FIFTH CONGRESS

FIRST SESSION

ON

H.R. 15

TO EXTEND FOR FIVE YEARS CERTAIN ELEMENTARY, SECONDARY, AND OTHER EDUCATION PROGRAMS

HEARINGS HELD IN WASHINGTON, D.C.
JULY 21; AUGUST 3, 4, 1977

Printed for the use of the Committee on Education and Labor
CARL D. PERKINS, *Chairman*

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PART 10: PLANNING AND EVALUATION OF ELEMENTARY AND SECONDARY EDUCATION

THURSDAY, JULY 21, 1977

House of Representatives,
Subcommittee on Elementary, Secondary,
and Vocational Education,
Committee on Education and Labor,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:30 a.m., in room 2175, Rayburn House Office Building, the Hon. Cecil (Cec) Heftel presiding.

Members present: Representatives Heftel, Mottl, Kildee, Quie, and Pressler.

Staff present: John F. Jennings, majority counsel; Christopher Cross, minority senior education consultant; and Nancy L. Kober, staff assistant.

Mr. **Heftel**. If it is all right with you, ladies and gentlemen, we will start by saying aloha as if we were in Hawaii.

We welcome Dr. O'Keefe, and Dr. Relic, to your left, and Dr. Evans.

The Subcommittee on Elementary, Secondary and Vocational Education is continuing hearings on H.R. 15, a bill to extend for five years certain elementary and secondary education programs that expire at the end of fiscal year 1978. Today we will focus on planning and evaluation of elementary and secondary education programs conducted by various levels within the Department of Health, Education, and Welfare but we will really only be talking about education without encumbering ourselves with the other two facets.

I am delighted to welcome here today three distinguished gentlemen from the Department of HEW: Dr. Michael O'Keefe, Deputy Assistant Secretary for Planning and Evaluation/Education, Department of HEW; Dr. Peter Relic, Deputy Assistant Secretary for Education, Education Division; and Dr. John W. Evans, Assistant Commissioner, Office of Planning, Budgeting and Evaluation, Office of Education.

Although planning and evaluation are obviously very important stages in the administration of education programs, I feel that the Congress has not paid sufficient attention to these processes. In fact, this is the first time that I recall our subcommittee having invited planners from all three levels to present testimony together.

Obviously it is the kind of testimony that should be considered in tandem and jointly.

As part of our review of all the expiring elementary and secondary education programs, I would like you gentlemen to tell us what your responsibilities are at each level, and how these responsibilities are coordinated. I also think it is crucial at this time to get testimony in the record of what evaluations are in progress on these expiring programs and when they will be completed. In other words, we need to know what you will be able to tell us about each of the elementary and secondary education programs before the end of the year, so that we will be able to take these evaluations into consideration when we write reauthorizing legislation next year.

Dr. O'Keefe, would you like to start.

STATEMENT OF DR. MICHAEL O'KEEFE, DEPUTY ASSISTANT SECRETARY FOR PLANNING AND EVALUATION/EDUCATION, DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE; DR. PETER D. RELIC, DEPUTY ASSISTANT SECRETARY FOR EDUCATION, EDUCATION DIVISION, HEW; DR. JOHN W. EVANS, ASSISTANT COMMISSIONER, OFFICE OF PLANNING, BUDGETING, AND EVALUATION, U.S. OFFICE OF EDUCATION, ACCOMPANIED BY ALBERT L. ALFORD, ASSISTANT COMMISSIONER FOR LEGISLATION, U.S. OFFICE OF EDUCATION; MRS. ANN BEZDEK; CARL E. WISLER; AND ROBERT MANRONEY.

STATEMENT OF DR. MICHAEL O'KEEFE

Dr. O'KEEFE. Thank you, Mr. Chairman.

[The statement of Michael O'Keefe follows:]

Statement by
Michael O'Keefe
Deputy Assistant Secretary for
Planning and Evaluation/Education
Department of Health, Education, and Welfare
Before the
Subcommittee of Elementary, Secondary and Vocational Education
Committee on Education and Labor
House of Representatives

Mr. Chairman and Members of the Committee

I am pleased to appear before you today to discuss HEW's education evaluation activities. It is my intention to address two items in this testimony. First, I will provide a brief background description of how education evaluation activities are presently administered in HEW. Secondly, I will briefly describe the general ways in which my office utilizes available evaluation dollars to improve the quality of policy decisions that are made about these programs. Upon completion of my statement, I will then ask Dr. John Evans, Assistant Commissioner of Planning, Budgeting and Evaluation, of the Office of Education to speak about the activities which his office undertakes and Dr. Peter Relic, Deputy Assistant Secretary for Education to describe the evaluation activities of that office and of the units which report to it.

Presently, there are three principal offices in HEW which are involved in education evaluation activities: the Office of the Assistant Secretary for Planning and Evaluation, the Office of the Assistant Secretary for Education, and OE's Office of Program Planning, Budget, and Evaluation. The table below illustrates the allocation of evaluation dollars for a five year period.

Table I

Where Do the Education Division Evaluation Funds Go?

FY 74-78

(Millions)

	74		75		76		77		78 Est	
	$	%	$	%	$	%	$	%	$	%
OE/OPBE	10.22	81.4	16.47*	86.0	14.60*	85.1	16.47*	86.4	22.53	89.2
ASPE	1.38	11.0	1.73	9.0	1.60	9.3	1.63	8.6	1.77	7.0
ASE(EPRC's)	.95	7.6	.95	5.0	.96	5.6	.96	5.0	.96	3.8
Total	12.55	100.0	19.15	100.0	17.16	100.0	19.06	100.0	25.26	100.0

* $5 million transfered to NIE by Congressional mandate for support for support of Study of Compensatory Education.

As indicated in the table, the Office of Education will have an estimated $22.53 million for FY 78, or almost 90% of the funds; the Assistant Secretary for Education about $1.0 million or nearly 4%, and my office will administer about $1.8 million or 7.0% of the total.

As you know, Congress has provided evaluation authorities and funds under several other pieces of legislation, principally Follow Through, ESAA, Title I of ESEA, various portions of the Special Projects Act, and Right to Read, as well as Section 416 of the General Education Provisions Act. The evaluation authority provided by GEPA account for only 3% ($7.1 million) of the evaluation funds appropriated to the Office of Education but is the sole source of education evaluation funds administered by the Office of the Assistant Secretary for Planning and Evaluation. 25% of these funds are administered by this office. The funds which the Assistant Secretary for Education administers come from the Salaries and Expense line item for the Assistant Secretary's office.

It might also be useful to characterize the type of work each office performs. First, the Office of Education generally funds contracts which undertake comprehensive evaluations of its 100+ programs with a particular emphasis on how those programs impact on the clientele and on the educational outcomes for the participants. The funds expended by the Office of the Assistant Secretary for Education are used to support three education research policy centers which are focused in substantive areas and which produce a series of formal policy studies and which are on call for quick analyses on specific policy questions. The work in my own office is geared toward responding to the Secretary's needs and toward analyzing budgetary and policy options. The exploration of options for programs such as impact aid, for example, requires the computer analysis of large amounts of data drawn from a number of separate data sets.

Finally, I would like to describe very briefly how we coordinate education evaluation activities in HEW — and how we try very hard to avoid redundancy and duplication and to maximize the use of these evaluation dollars. As an initial step, the Assistant Secretary for Planning and Evaluation prepares a guidance memorandum that identifies major issues to be studied, specific evaluations that are needed, and the responsibilities of each major office for carrying those out. Based on that guidance, each office — ASPE, ASE, and OE — prepares an evaluation plan. The plans are then reviewed by all three offices (in addition to other staff offices such as budget and legislation) to insure that the proposed projects are relevant to the legislative, administrative or budget decisions which are anticipated. We believe the joint review ensures non-duplication of effort and helps to produce a more coherent set of evaluation activities. As appropriate, individual projects are reviewed for policy and legislative relevancy as they are developed. After the Request for Proposal (RFP) has been issued, representatives from the three offices participate in the proposal review panels. For larger studies, the members of the proposed panel often remain as members of an advisory committee to the project. In those instances in which it is appropriate, technical assistance from experts (statisticians, etc.) is obtained from NCES, NIE, or sometimes through the use of outside consultants. In addition to these arrangements, any project that involves new data collection is submitted to the Education Data Acquisition Committee (established by P.L. 94-482 section 406) for review and appropriate coordination of information and data acquisition activities in the Education Division. This step is taken to eliminate duplications of data collection efforts that may be underway elsewhere in the agency.

As I stated, the specific work performed in my office is usually very specifically focused on policy decisions with which we are concerned. Several examples will serve to illustrate the nature of the studies we undertake for Department use internally, to assist the Secretary's budgetary, legislative, and general policy decisions.

Patterns of Federal Aid to School Districts

This study analyzed the distributional patterns of Federal aid to school districts. The question specifically addressed was whether funds for the major programs areas — those that accounted for $3.6 billion of the total of $4.1 billion in elementary and secondary education aid in fiscal year 1974 — reach the school districts that are most in need. This study classified districts on three measures — by family income, by property wealth, and by degree of urbanization — and examined the flow of Federal funds to priority districts of each group.

The study indicated no one of the major aid programs was allocated in a way that satisfied the needs represented by the three groupings of districts studied. When these funds were aggregated, the resulting pattern of total Federal funding showed:

- Overall, an emphasis on low-income districts.
- In the more urbanized States, an emphasis on the cities
- In less urbanized States, an emphasis on rural districts.

In the aggregate, Federal aid to education appeared to be quite well targeted on districts disadvantaged by lack of family income by degree of urbanization; but the aggregate did not target nearly as well on districts disadvantaged by lack of taxable property.

This study is being updated using 1975 data to assess whether the reforms contained in the Education Amendments of 1974 altered the allocation patterns of Federal aid. As such, the study will be important to the Secretary's recommendations to you for reauthorizing the major elementary and secondary programs.

- A Federal Role in the General Program of School Finance

This study analyzed arguments for extending the Federal Role in School Finance, explored different Federal strategies, and examined the policy implications of these strategies. Specifically, the study analyzed:

- the intra and inter state inequalities existing in the education finance system
- the problems and added costs involved in establishing standards for equalizing school financing within States and across States
- the potential for extending the Federal General Revenue Sharing programs to the financing of education

With the provisions in Education Amendments of 1974 establishing planning grants for assisting States in reforming their finance structure and requiring criteria for assessing school finance structures in the Impact Aid States, school finance issues will certainly arise in the ESEA re-authorization hearings. This analysis will provide helpful background in the debate of those issues.

- A Study of Impact Aid. This study evaluated program options authorized by P.L. 93-380. It will assess the degree to which the new program succeeds in targeting aid on the needy districts and the coordination of impact aid funding with local school finance goals. A comprehensive data base makes possible assessment of several different reforms in terms of geographic, fiscal capacity, and wealth characteristics of districts. Methods of estimating local education costs and various wealth and absorption of burden capabilities are being examined.

  Our study will also analyze different options for meeting legislative goals.

- College Choice Under Modification of the BEOG Formula. This study assessed the impact of alternative changes in the BEOG Family Contribution Schedule on the level and pattern of postsecondary enrollments as well as the distribution of program benefits. Two alternative models of students' postsecondary enrollment behavior were tested to predict students' decisions to enroll and their choice of a particular college, under varying assumptions of net cost of attending. The analyses model refinement is important for developing accurate estimates of BEOG costs.

My office is coordinating the Department's analytic efforts in preparation of our legislative recommendations for expiring education programs. We are conferring with program staff from the Office of Education, the Assistant Secretary for Education Staff, NCES and Office of the Secretary staff from Legislation and Budget. We are drawing heavily from evaluations being discussed here this morning from the offices represented at this table. The results will be major substantive legislative recommendations based on the best evaluative data available. We look forward to conferring and coordinating with your Committee during this process.

Thank you, Mr. Chairman for the opportunity to discuss our Planning and Evaluation activities. I would now like to ask Dr. Evans of the Office of Education to present an overview of what is obviously the largest grouping of education evaluation activities in the Department.

Dr. O'**KEEFE**. It is a pleasure to be here today. I have submitted a relatively brief statement responding to the questions you have addressed to us for the record. I would like to summarize very briefly what the major points of that statement are.

First of all, the three items you have requested here represent, first of all, in my case, the chief policy office to the Secretary for staff work for policy analysis in the area of education. Secondly, the office that Dr. Relic represents, which is the Office of Assistant Secretary for Education, is the chief administrative office for education within the Department of Health, Education, and Welfare. Dr. Evans represents the Office of Education, which is, of course, the major administering agency for our education programs.

The evaluation funds that are expended by us in the pursuit of our duties as policy analysts and evaluators split roughly in the following proportion: About 7 to 8 percent of those funds are expended by my office, 4 to 5 percent at the Assistant Secretary for Education level, and almost 90 percent of those dollars are expended by the Office of Education by Dr. Evans' office.

The total available funds that we estimate for fiscal 1978 is on the order of about $25 million. These dollars come to us through a variety of authorizations that you have provided. A number of programs—Follow through, Title I, the Emergency School Assistance Act—provide direct funds for the evaluation of those programs,and, as you are aware, the General Education Provisions Act, Section 416, provides an additional amount of dollars for the evaluation of programs across the board.

This latter provides approximately 40 percent of all of the funds that we expend in a given year and is the sole source of the funds that are administered by my office in particular.

Additionally, let me comment on the question you raised about the coordination of the work of the various levels. I think that the level of coordination can be described as fairly high. As initial plans are developed as actual requests for proposals are issued for public response, as proposals are reviewed, as those proposals are monitored and, assuredly as plans are made to use the results of these studies, our offices are all involved with one another in a review and clearance process.

As an example, the monitoring of projects such as the policy centers administered by the Assistant Secretary for Education is performed by a group including the three parties present today, and other people from around the department who review these centers several times a year.

Another example of coordination and the use we make of these studies is in our own departmental review of the act to which you have referred. We have established within the department a series of task forces examining each of the expiring titles. These task forces are performing their work under the general supervision of an overall group made consisting of the Assistant Secretary for Planning and Evaluation, the person to whom I report, the Assistant Secretary for Education and Commissioner Boyer, and including the Director fo the National Institute of Education and representatives of other major staff offices within the department that are concerned with education.

Under the aegis of that group we have work groups examining each of the titles and analyzing options for possible proposal to the Secretary for changes in these titles. Involved in each of these work groups are the relevant staff people from each of the offices that are represented here today who monitor these evaluation studies, who have helped design them, and who insure that their results are in fact brought to bear on those discussions.

In these introductory remarks, I could comment on these examples in some detail, but I will refer briefly only to the actual studies done in my office.

We use evaluation funds principally to insure that we have the capability to examine budget options for existing programs and explore major policy changes for legislation up for reauthorization. For example, over the past three years, a good deal of the expenditure of evaluation funds by my office has been focused on this upcoming review of ESEA and the various programs that are expiring. We have established a series of data systems on school population and on distribution of funds in impact aid in Title I which allow us to perform detailed analyses of the effect of particular options that might be considered for changing those two programs. This has given us a tool that allows us to determine the impact and the differential impact on various kinds of districts of particular changes we might entertain.

Another example of evaluation fund expenditures, which does not relate directly to expiring legislation, but is of significant importance for our annual decisions, is the establishment of a mechanism for estimating the number of dollars required for basic education opportunity grants in a given year. This process is an intimate part of our budget estimation each year.

This is a brief overview of the kinds of things you will find in the written statement.

I thank you and would be quite happy to entertain questions on this.

I would like, at the will of the chairman, to turn the presentation over to Dr. Peter Relic, Deputy Assistant Secretary for Education within the department who will speak about the activities of his office.

Mr. **Heftel**. Thank you.

Dr. Relic, please.

STATEMENT OF DR. PETER D. RELIC

Dr. **Relic**. Thank you, Mr.Chairman. I am pleased to be here this morning, particularly honored since this is my first time before such an august body.

[The statement by Peter Relic follows:]

Statement by
Peter D. Relic
Deputy Assistant Secretary for Education
Education Division
Department of Health, Education, and Welfare
Before the
Subcommittee on Elementary, Secondary, and Vocational Education
Committee on Education and Labor
U.S. House of Representative

Mr. Chairman and Members of the Subcommittee:

It is my pleasure to appear before you to discuss the role of the Office of the Assistant Secretary for Education which is central to the planning, evaluation, and budget process of the Education Division. I will speak briefly about our activities in each of these three areas.

In planning we are involved at each stage of the process in the Education Division -- in identifying and analyzing issues bearing on the Federal role in education, in preparing and supporting policy initiatives of the Assistant Secretary and the Department, and finally in implementing policy changes in education, especially when such changes cut across the Education Division or across several Federal agencies. Our capacity for conducting these activities is primarily lodged in our Policy Development Office, whose resources consist of eight policy analysts and three Educational Policy Research Centers.

With respect to the first planning stages, the policy analysts in this office conduct limited in-house studies aimed at identifying and exploring new issues in education. Also, they direct the work of the Policy Centers in considering new initiatives. An example of this kind of work is the analysis conducted by one of our policy centers on the topic of encouraging program continuity from one year to the next for children enrolled in compensatory education programs. The Chairman and ranking Minority Member of this Subcommittee, in fact, recently received copies of a Policy Center report on this topic, entitled "Evaluating Long-Term Achievement: An Analysis of Longitudinal Data from Compensatory Education Programs." We are currently pursuing this issue in a follow-up study which will look at the topic of program continuity from the perspective of summer programs for compensatory students and year-round schools. I might add that this example also demonstrates how our three offices [ASE, OE/OPBE, and ASPE] interact. We are working with John Evan's office [OE/OPBE] in integrating our findings on program continuity with his work on developing evaluation models for ESEA, Title I. We are working with Michael O'Keefe's office [ASPE] by integrating his work on year-round schools and looking at how such schools may improve the opportunities for year-to-year program continuity for compensatory education students.

In planning we also provide analytical support for current initiatives in education. A prime example of that function is our current work on proposals for the reauthorization of ESEA and other expiring education statutes. We are working closely with OE, NIE, and ASPE in preparing legislative recommendations, and we hope to be able to present them to you in several months. In this process we rely heavily on the evaluation findings of OE/OPBE, the policy studies of our Policy Centers, and the research products of NIE.

Finally, in planning we also oversee the implementation of education policies which cross-cut more than one HEW agency. An example of this type of work is the recent development of guidelines pursuant to the Adams v. Califano court case concerning desegregation of selected State postsecondary systems. Staff from ASE are currently pursuing ways of modifying new or proposed Federal programs in order to provide greater assistance to these States to meet the Federal guidelines. We are looking particularly at our Developing Institutions program and at our proposals for aid to minority students pursuing graduate and professional degrees.

In addition to planning activities, we are also concerned with overseeing and using the program evaluations conducted by OE/OPBE. Our participation in this area includes the development of evaluation plans, a role exemplified in our activities to coordinate NIE's mandated studies of Title I, ESEA with OE/OPBE's evaluations of the Title I program. Members of the ASE staff also review OE/OPBE evaluation plans, participate in defining the scope of proposed evaluations, and assist in selecting contractors for specific evaluation studies. Finally, NCES conducts systematic reviews of proposed evaluations through its Education Data Acquisition Council.

In the area of budgeting, ASE's role is changing. The Secretary has asked that we create a new position of Deputy Assistant Secretary for Management and Budget, who will be responsible for structuring and overseeing the budget activities of the entire Education Division.

As a final note I would like to point out the key role of the ASE Policy Centers in our policy-development activities. They provide the analytic resources to carry out short-term policy studies on topics of immediate interest to us and to you. Because they are slightly removed from the day-to-day press of business, they are able -- under our direction -- to conduct studies of greater depth and even perhaps greater objectivity than we could accomplish working strictly in-house. The policy relevance of their work is insured not only by our close contact with them but also by our Policy Center review team composed of the two gentlemen with me today as well as the Deputy Director of NIE and an NCES representative. In addition, this interagency team assures that their work will complement and not duplicate other federally supported activities.

The Policy Centers provide a unique, responsive resource which has proven to be of benefit to the education policy activities of the Department.

Thank you, Mr. Chairman. We would be most happy to entertain any questions you might have at this time.

Dr. RELIC. I think it is germane, and I hope you will too, to editorialize a bit on why I am here, not just because you asked me to be here today but why I acccepted the position of Deputy Assistant Secretary. Again I do think that is responsive to some of the questions you have called to our attention.

As an educator at the local level, a teacher, principal, assistant superintendent for curriculum and instruction and as superintendent of schools most recently, I have long been concerned about the services provided to the states and to the local districts by the Federal Government. When we talk about planning and research and evaluations, we at the local level have been saying to the Federal level every year: You must give us the evaluations and participate with us in the evaluations to improve Title I.

The program is not good enough. It is not serving extensively enough, and together the local districts and the states and the Federal Government have to improve the procedures and the delivery of services.

We need more basic research on how people learn, we have been saying for years and years. We simply do not know enough about how children learn to read and to compute. We need more statistical information on demographic changes. The country is changing so rapidly. We need all the help we can get from the Federal level concerning the demographic changes as they relate to schools. We at the local level and in the states have been going through some trauma lately on the financing of public education and have been asking the Federal Government to provide us with all necessary information on the financing of education and state equalization.

We need more help on desegregation; research on how really it has worked; revised instructions relating to the handicapped, bilingual programs, how do we make them better; the effectiveness of vocational training.

All of this is to say I accepted this position because I thought the Office of the Assistant Secretary of Education in HEW could begin to deliver better services throughout ther Education Division so that we could become more responsive to the needs of the states and the local districts. I have not changed my mind at all on that in the five months here.

What I have found is it is crucial for us to do these things, everything from the renewal of authorization of Title I to the research, so we can teach more effectively. The Office of the Assistant Secretary becomes crucial in coordinating the activities within the Education Division, in helping develop the policies and communication in those cross-cutting issues from department to department.

I think some of the work we have accomplished has been effective, but more than ever we need to work with you and the education community to identify those areas where we have to work more effectively.

The bottom line is the delivery to the local districts of all the research and all the statistics and all the evaluation studies we do, particularly in the area of ESEA, so that education, meaning the teaching of young people, can be more effective.

The role of the Assistant Secretary for Education and Planning is in fact, as I have indicated, central to this.

It identifies and analyzes issues bearing on the federal role in education, in preparing and supporting policy initiatives of the Assistant Secretary and the department, and finally in implementing policy changes in education, especially when such changers cut across the Education Division or across several Federal agencies.

With respect to the first planning stages, the policy analysts in this office conduct limited in-house studies aimed at identifying and exploring new issues in education. Also they direct the work of the policy centers in considering new initiatives. An example of this kind of work is the analysis conducted by one of our policy centers on the topic of encouraging program continuity from one year to the next for children enrolled in compensatory education programs.

The chairman and ranking minority member of this subcommittee, in fact, recently received copies of a policy center report on this topic, entitled, "Evaluating Long-Term Achievement: An Analysis of Longitudinal Data from Compensatory Education Programs." We are currently pursuing this issue in a follow-up study which will look at the topic of program continuity from the perspective of summer programs for compensatory students and year-round schools. I might add that this example also demonstrates how our three offices (ASE, OE/OPBE, and ASPE) interact. We are working with John Evans' office and ASPE by integrating their work on year-round schools and looking at how such schools may improve the opportunities for year-to-year program continuity for compensatory education students.

The renewal authority will not be transmitted from the Assistant Secretary to Congress until we have had extensive communication with citizens. That is why it is so crucial we have this input. The hearings held in July literally brought this to us so that we could integrate not only the work of the Office of Education and the Assistant Secretary for Planning and Evaluation but also the concerns of educators and the general public.

Finally, in planning we also oversee the implementation of education policies which cross-cut more than one HEW agency. An example of this type of work is the recent development of guidelines pursuant to the *Adams* v. *Califano* court case concerning desegregation of selected state postsecondary systems. Staff from ASE are currently pursuing ways of modifying new or proposed Federal programs in order to provide greater assistance to these states to meet the Federal guidelines. We are looking particularly at our developing institutions program and at our proposals for aid to minority students pursuing graduate and professional degrees.

In addition to planning activities, we are also concerned with overseeing and using the program evaluations conducted by OE/OPBE. Our participation in this area includes the development of evaluation plans, a role exemplified in our ativities to coordinate NIE's mandated studies of Title I, ESEA with OE/OPBE's evaluations of the Title I program.

It really does not make much sense to have basic research done on how children can learn better unless they are related to the evaluation studies being conducted.

Members of the ASE staff also review OE/OPBE evaluation plans, participate in defining the scope of proposed evaluations, and assist in selecting contractors for specific evaluation studies.

Finally in the area of budget, the Office of the Assistant Secretary's role is changing here significantly. To this time there has been no Deputy Assistant Secretary for Management and Budget within the Office of the Assistant Secretary. However, by reallocating existing resources within the office, we are now attempting to pull together the Education Division budget and truly have overviewing and analysis and reaction to all the components of the Education Division, not only the Office of Education but the Center for Education Statistics, NIE, and the other components, so it is in budgeting, as well as planning, perhaps more than any other area that the Office of the Assistant Secretary of Education will emerge as central in the coordinator role through out the Education Division.

Again, I am pleased to be before the group this morning, and I would be happy to respond to any questions that you have.

Mr. HEFTEL. Thank you, Dr. Relic.

Dr. Evans, would you like to present your material to us now?

STATEMENT OF DR. JOHN W. EVANS

Mr. HEFTEL. Were you intending to read your statement in full?

Dr. EVANS. I can follow whatever course you suggest, Mr. Chairman.

Mr. HEFTEL. We will start hearing bells at about 10 o'clock; I think perhaps we might benefit from having you summarize as you think is going to communicate the information necessary for our dialogue later, but I do not think it is necessary to read the entire text because it will be entered into the record.

Dr. EVANS. I will be happy to follow those lines, Mr.Chairman.

[The statement by John Evans follows:]

Statement by
John W. Evans
Assistant Commissioner, Office of Planning,
Budgeting and Evaluation
U.S. Office of Education
Department of Health, Education, and Welfare
Before the
Subcommittee on Elementary, Secondary, and Vocational Education
Committee on Education and Labor
U.S. House of Representatives

Mr. Chairman and Members of the Committee:

I am happy to appear before you today to discuss the Office of Education's program evaluation activities. As you know, the activities in question are authorized by Section 416 of the General Education Provisions Act. This authority was enacted in 1968, originally as Section 402. Prior to that time, it is my understanding that very limited program evaluation activities were carried out on Federal education programs under the authority of the old Cooperative Research Act, which, of course, was superseded with the enactment of the Special Projects Act in 1974.

Funds under the current authority first became available in Fiscal Year 1970 with an initial appropriation of $9.5 million. Thus, the history of serious efforts to assess the effectiveness of OE's programs is relatively brief. The amount the Congress has appropriated under this authority since 1970 has varied from $5.5 million to $12.5 million with the current (FY '77) appropriation being $7.1 million. This amounts to less than one-tenth of one percent of the total OE budget of $8.8 billion.

Although this oversight hearing is concerned with the evaluation authority provided by Section 416 of GEPA, it is important to keep in mind that the Congress has provided evaluation authorities and funds under several other pieces of legislation, principally Follow Through, ESAA, Title I of ESEA, several of the programs included under the Special Projects Act and Right to Read. Under the present set-asides in these various authorities, Congress appropriated an additional $11 million in FY '77 for evaluation purposes, making a grand total of $18.1 million. This figure amounts to one-fourth of one percent of OE's total FY '77 appropriation.

Since I have been personally responsible for the administration of OE evaluation activities and funds since 1971, I think it would be useful for me to sketch a brief history of what our goals have been, how we have set about to achieve them, and what the results have been.

I personally believe that an objective and technically sophisticated evaluation mechanism is absolutely essential in Federal Agencies if either the Executive Branch or the Congress is to have any real success in rationalizing the allocation of resources, the formulation of policies, or the improvement of programs. Thus, the kind of authority provided in Section 416 of GEPA is extremely important. The isolated decisions by the Congress to provide legislative set-asides in addition to the GEPA authority has resulted in something of a patchwork quilt of authorities and funding sources which probably should be streamlined. As the Administration prepares recommendations for the 1978 reauthorizations, one option we may consider among others is replacing Section 416 with a standard evaluation set-aside for all education authorities.

My main point here, however, is that some authority like either Section 416 or a programmatic set-aside, and sufficient funds to support an adequate evaluation function, are vitally important if objective information on program effectiveness is to be continuously produced. The Department will be returning to the Committee with specific recommendations.

Programs cannot and should not evaluate themselves, and the process of evaluation should not be casual, subjective, or anecdotal. If we are to have solid evaluations of program effectiveness, they must use the very best of modern social science techniques. We cannot escape the cost and complexities of representative samples, quantitative pre-post measures, comparable control groups, sophisticated statistical analysis of data, and the like. All of these require highly trained people, and they take time and money.

The kind of evaluation mechanism we have tried to build at the Office of Education has been consciously designed to try to avoid the deficiencies and pitfalls that in my experience have characterized many other Federal evaluation activities. It has been my experience that formal evaluation studies of program effectiveness are often late after-thoughts initiated by program or administrative staffs without technical evaluation competence, and too often result in reports that are too late to affect the decision which gave rise to the study in the first place, too voluminous to be read by those in a position to affect the program, and too technically esoteric to be understood by them in any case, with the result that the study often goes on the shelf, unread and unused. Worse still, an opportunity has been lost to improve the decisionmaking process, and evaluation as a function comes to be seen as irrelevant and unworkable.

In an effort to avoid this array of problems and to make evaluation useful to both the Congress and Executive Branch for decisionmaking purposes, we have done several things. We have put together a technically qualified evaluation staff--people with advanced training and graduate degrees in such areas as experimental design, educational measurement, sampling, and quantitative analysis. In an effort to make sure that evaluations are methodologically sound and policy relevant, we have the members of this technical staff design the studies in-house. That is, we do not contract out for the basic design for our program evaluations. They are done by the in-house technical staff with extensive internal review and coordination with program managers. Once a satisfactory and detailed design is achieved we do contract out through the competitive procurement process for the conduct of the evaluation. We do not use grants or sole source procurements.

Once the study is launched, it is monitored in a very close, hands-on way to insure that technical and field-work standards are maintained, and that the study does not drift from its original focus.

Finally, when an evaluation study is completed there remains the all important task of communicating its results. As I indicated above, the lengthy and complex technical reports that are the natural and appropriate products of an evaluation study are wholly inappropriate vehicles for commuicating the results of evaluation studies to program and Agency Heads and Members of Congress. We have tried to deal with this problem by preparing short, plain-language,executive summaries on all our completed evaluation studies. These are sent routinely not only to appropriate people within the Office of Education, the HEW Secretary's Office, and OMB, but also to all members and staff of both the House and Senate Authorizing and Appropriation Committees.

It is now clear to me that even as useful as these summaries have been, the time pressures on Congressmen coupled with the enormous volume of paper they receive each day, mean that still further steps should be taken if we are to get the knowledge from these evaluation studies into the thinking and decisionmaking of the prople who affect Federal education programs. Accordingly, we are planning to begin soon a series of oral briefings on evaluation study results for Congressional staff.

Another important mechanism for the communication of evaluation findings is the Annual Evaluation Report required by Section 417 of GEPA. This report is a handy compendium, containing for each of the more than 100 OE programs its legislative and budgetary history, the statement of its objectives and activities, as well as a summary of any evaluation findings that may be available on it.

Our Office of Legislation has been coordinating the preparation of the Renewal Evaluation Report as required by Section 417 of the General Education Provisions Act for the Assistant Secretary for Education. This report includes evaluation findings on expiring programs where available as a basis for recommendations for modification of the expiring programs. It is also an illustration of cooperative support within the Education Division.

A final procedural step we are attempting to institutionalize within the Office of Education goes beyond the mere communication of evaluation results to their implementation into some kind of action. We are now beginning to prepare from each completed evaluation, something called a Policy Implications Memorandum (PIM). It spells out in detail the kind of actions we think ought to be taken in the areas of general policy, proposed legislative changes, budgetary proposals and program regulations, and assigns these actions to specific offices to be accomplished by a designated date.

If it is fair to say that we have made some progress in developing an effective evaluation mechanism, we must also ask how productive it has been thus far. The general answer, I believe, is that while the system we have in place is the right way to go about doing good program evaluations, we are only now, in the last year or two, beginning to see timely and useful results from it. The tasks of putting the staff and system together, and of dealing with the mounting internal clearances and external fieldwork problems have meant that reaching a point of reasonably smooth and continuously productive operation has been harder and taken longer than we had anticipated at the outset.

Staff members of the various committees have often complained that there were no evaluation results to help them with decisions in critical authorizing and budgetary areas, and even more irritatingly, that such findings became available shortly after the decisions were made. These are justified criticisms, and we are taking all the steps we can to correct them. On the level of funds with which we are now operating and with the present size of our staff, it will be impossible for us to carry out evaluation on all of OE's more than 100 programs on a regular, recurring basis. But the timeliness matter is our responsibility to improve, and we are making efforts to do so. This year, for example, we were able to make available for this Committee's use in its reauthorization of Elementary and Secondary programs major evaluations of Title I, the Emergency School Aid Act, the Bilingual Education Program, and Follow Through. We also expect to have a number of final and interim reports in elementary and secondary education available by next March which may be of use to the Congress in its consideration of program renewal. The following table lists the future reports.

Elementary and Secondary Education
Evaluation Reports Available
by March 1978

Fund Source	Final Reports
ESAA funds	Evaluation of the Emergency School Aid Act Basic LEA and Pilot Programs
P&E funds	Evaluation of ESEA, Title III National Diffusion Network
P&E funds	Federal Programs Supporting Educational Change
Follow-Through funds	Several Reports on Follow Through--contractor and in-house analysis of contractor findings
	Interim Reports
Title I and P&E funds (mostly P&E)	Evaluation of the Title I Program in State Institutions for Neglected and Delinquent Children
Title I funds	Study of the Sustaining Effects of Compensatory Education
PIPs funds	Evaluation of Project Information Package Dissemination and Implementation

Most of these studies take on the order of 24 months to complete, and larger ones like the Title I study may require three or four years. So both planning and execution of evaluations have to be very tight if the kind of timeliness achieved in this instance is to become routine.

As I said, while much remains to be done to bring this evaluation mechanism to the level of productivity and timeliness that I personally, and I know this Committee, would like to see, there are, nevertheless, I believe, some growing indications that the findings being produced are important and relevant to Federal education programs and are beginning to be used to make decisions about these programs.

1. Several recently completed studies indicate that compensatory education is beginning to have a positive impact on disadvantaged children in that there is fairly widespread evidence of improvements in basic skills which can be attributed to programs like ESEA Title I and ESAA. Though the educational problems of disadvantaged children are far from solved, the new evidence does constitute a shift in the general outlook. As such, the results are being used in support of budgets for compensatory education programs. They also provide a basis for continued emphasis on classroom activities directly aimed at improving basic skills in reading and mathematics.

2. A study of the ESEA Title VII bilingual program found that two major problem areas in bilingual education are a severe shortage of trained teachers and a perceived lack at the project level of adequate bilingual curricular materials. These findings have resulted in an increased emphasis on staff development and training and on development of curricular materials. A more recent major evaluation of the bilingual education program found that as many as 70 percent of its participating children were not of limited English-speaking ability. This has already resulted in Senate Appropriations

Committee Report Language (FY 1978) calling for the program to "make whatever administrative changes are necessary to ensure that bilingual education projects are primarily focused on achieving English language competence and returning students to English language classes."

3. A study of the Title I Migrant Education program emphasized problems in the current fund-allocation formula and procedure, providing impetus to the conversion of data in the Migrant Student Record Transfer System as the basis for full allocation. That conversion, recommended by the study and authorized by PL 93-380, was subsequently approved by OE.

4. A study of the Emergency School Assistance Program found that human-relations programs in schools were effective in improving the attitudes toward integration of urban white students. In addition, black student achievement test scores were higher in schools where white students had more positive attitudes toward integration. As a result of the study, steps were taken to increase the funding of human relations activities under the Emergency School Aid Act.

5. Another evaluation of school desegregation produced A Handbook for Integrated Schooling. It provides illustrations of specific practices and policies as well as suggesting ways of building a school environment that is supportive of school desegregation. By March 1977, 11,500 copies of the Handbook had been distributed.

6. A number of studies contributed to the development of two budget projection models, the BEOG Enrollment/Student Aid Model, and the GSLP Loan Flow Model. The BEOG Enrollment/Student Aid Model has been used by both the Administration and Congress to project the estimated costs and benefits of the Basic Grant Program. The GSLP Loan Flow Model has been used to identify the potential magnitude of the default problems, to estimate the level of interest and default subsidy necessary for budget purposes, and to identify the characteristics of the default experience by institutions, lenders, and borrowers.

7. A study of the Guaranteed Student Loan Program recommended that the GSLP Special Allowance paid to banks vary directly for each fiscal quarter with the latest 90-day average of either 91- or 180-day Treasury bills. That study, and the Survey of Lenders in the Guaranteed Student Loan Program, both showed that lenders were receiving low net yields (or losses) from their participation in GSLP. These findings appear to be directly related to the increase in the maximum Special Allowance from 3.0 to 5.0 percent beginning in FY 1978, as mandated in the 1976 Higher Education Amendments. As a result, lenders would be able to maintain profit margins on these loans during periods of very high interest rates when the "formula" would result in a Special Allowance above the current 3.0 percent ceiling.

8. Findings of A Study of Accreditation and Institutional Eligibility have been made available to the Federal Trade

Commission and to several Congressional committees. This study has promoted an understanding of the process for establishing institutional eligibility for Federal programs and the limitations of using that process. New FTC regulations relating to proprietary institutions were developed in part on the basis of findings from this study. New legislation has been passed which is consistent with the recommendations in the report regarding eligibility of institutions.

9. An Assessment of Vocational Education Programs for Handicapped Students, completed during 1975 and circulated widely in Congressional committees, addressed problems in the existing system and described how States set priorities and allocate funds. Planning was reported as usually short-term and generally directed toward justifying certain projects. Lack of adequate management information inhibited planning and resulted in inadequate monitoring and evaluation at the State and local levels. In the 1976 Amendments to the Vocational Education Act of 1963, Congress requires and authorizes funds for planning efforts at the State level, and mandates program planning and accountability efforts aimed at improving evaluation at the Federal, State and local levels. The 1976 Amendments also require the development of a national vocational education reporting and accounting system.

10. On the basis of the Evaluation of the Exemplary Vocational Education Projects Program, Part D, VEA, USOE identified seven

major areas in the FY 1976 Proposed Rules and Regulations designed to correct weaknesses noted in the report. The study found that there were management problems at both the Federal and local levels which account for a lack of impact in most of the projects. The program had been in operation only three years when the evaluation was done, and the immediate response through specific changes in operating procedures reflects fairly rapid utilization of evaluation results in a developing program.

11. A study of the ESEA Title I allocation formula during 1972-73 forced consideration of the hard trade-offs involved in changing the formula or leaving it alone. Many alternative computations were provided Congressional committees in their considerations of PL 93-380 (the Education Amendments of 1974) and the study apparently influenced the final legislation.

12. The Analysis of Relationships Between Achievement Gains and Per Pupil Expenditures failed to find evidence for the fairly wide-held notion that a fixed dollar amount (e.g., $300 per pupil) of compensatory education funds is necessary for significant education achievement gains among disadvantaged students. The study resulted in a Policy Implications Memorandum to the Secretary of HEW which recommended that the Department no longer promote the "critical mass" position.

13. The evaluation project, State ESEA Title I Reports: Review and Analysis of Past Reports, and Development of a Model Reporting System and Format (June 1974-75) resulted in three evaluation models as required by Section 151 of ESEA, Title I. They prescribe standard techniques and generate data which can be tabulated and aggregated at State and Federal levels.

Prompted by that work and Section 151, the Office of Education is drafting program regulations to require use of the standard techniques, and a technical assistance program has been established to facilitate that use. The models have been implemented in over 20 States since the completion of the study, and nearly all States will be using them during the 1977-78 school year.

14. An important outcome of Federal evaluation studies has been the publication and distribution of "how-to" handbooks on topics in the area of education evaluation. Two handbooks are currently available and several more are being written. The Government Printing Office has sold more than 10,000 copies of the first one published, A Practical Guide to Measuring Project Impact, in the year it has been available. In addition, USOE has distributed nearly a thousand copies. More than 3,000 copies of the second handbook, A Procedural Guide for Validating Achievement Gains, have been sold since it became available six months ago. Handbooks are currently being written on such

topics as students' affective development, cost analysis for educational projects, and assessing bias in achievement tests. USOE is soliciting ideas for more topics to be included in the series.

15. Several studies identified effective projects in compensatory education and thereby led to the planning and implementation of the "Packaging and Dissemination" program under the authority of the Special Projects Act in PL 93-380. The program promotes the implementation of effective educational projects. To date, 12 projects in compensatory education and four projects in bilingual education have been "packaged" after approval for dissemination by the OE Dissemination Review Panel. Six of the compensatory education packages have completed field test and are being disseminated to the field.

The package based on effective projects were called Project Information Packages (PIPs) and were developed to provide adopting school districts with guides, manuals and other materials with enough detail to enable adopting schools to carry out all aspects of planning, starting and operating the projects.

16. A study to identify effective projects in the ESEA Title VII program resulted in approval of four projects by the Dissemination Review Panel. Descriptions of the four projects were disseminated nationally by the Title VII-funded national network of Training Resource Centers to school

districts interested in a Spanish-English or French-English education program. OE has also developed Project Information Packages (PIPs) for each of the four projects, and the PIPs will be field-tested during the 1977-78 and 1978-79 school years in those school districts that receive Title VII grants to implement the projects.

As We look to the future, Mr. Chairman, it is appropriate for me to cite some of the problems that will face us in trying to carry out evaluations of Federal education programs. I would like to mention three:

First, is the increasingly complex, costly and time-consuming forms-clearance process. The number of "layers" in this process has grown dramatically in the past two years as both Congress and the Executive Branch make a well-meaning attempt to reduce the burden of Federal paperwork on State and local respondents. For one-time, short-term evaluations which must often be synchronized with school-year operations for Fall and Spring testing, however, the elaborations of the clearance process is threatening to strangle the whole evaluation process. The delays we are now encountering add to contract cost, impair the evaluation's validity by changing the test dates, impair OE's credibility in the field because of consequent changes in prearranged dates at the schools for testing and other data acquisition with inevitable further disruption, and make it more difficult or indeed impossible to maintain timeliness for legislation renewal or program operations. In my judgment, the solution is establishment of one thorough and comprehensive forms-clearance review focused on need for the data, non-redundancy, and minimal data burden on respondents.

The second problem, closely related to the first, is the growing resistance in the field to Federal data collection. There was a time, no more than 10 years ago, when Federal gatherers of research, statistical, or evaluation data could go to the field with their survey forms, questionnaires or other instruments with the expectation that requests for information would be met without loud objection. The clamor in recent years from State and local agencies about excessive Federal burden has resulted in broad-scale efforts to reduce that burden. Evaluation data acquisition, a relatively minor although by no means insignificant component of Federal burden, has taken its share of the criticism and pressures towards reduction. Part of the solution is better communication by us to the field, though such agencies as CEIS (the Committee on Evaluation and Information Systems of the Council of Chief State School Officers) of the need for the data and of the vigorous review process by which data burden has been kept to a minimum. Another part of the solution is the continuing recognition by those seeking to reduce data burden of the unique nature of one-time, short-term, comparatively small-scale evaluations in contrast to recurring large-scale surveys and application forms in other areas.

Third, is the uneven nature of evaluation funding which, although impressive in the aggregate, includes ample continuing set-asides from program funds for ESEA Title I, ESAA, Follow-Through, Packaging and Dissemination, and Right-to-Read, but leaves evaluation activities for all other programs competing for scarce Planning and Evaluation funds or thriving briefly on one-time set-asides. As I stated above, one solution that the Administration will be considering is a standard set-aside from all program funds to be available for evaluation activities but to be returned to program funds if not so used.

In sum, Mr. Chairman, I believe it is fair to say that while significant progress has been made since 1971, when the evaluation authority and funds first became available to the Office of Education, in developing a workable evaluation system and in establishing a base of evaluation knowledge about the effectiveness of Federal education programs, a great deal remains to be done in expanding this base of knowledge and in doing so in a way that makes its output timely for both Executive Branch and Congressional decision makers. We are cognizant of these problems and are making efforts to improve them. We will appreciate the guidance and support that your Committee can give us on these matters.

I would now like to turn to Dr. Peter Relic to summarize the planning and evaluation activities of the Office of the Assistant Secretary for Education.

Dr. EVANS. To begin the summary of my written testimony, it is important to review the funds and authorities that this committee is conducting oversight hearings on today by way of a brief historical perspective.

As Mr. O'Keefe said at the outset, the Office of Education, principally my office, does administer about 90 percent of the funds that are under the section 416 of the General Education Provisions Act.

I think it is important to note that that Act, while originally passed in 1968, did not receive any funding until FY '70. Therefore, the history of evaluation studies in the Office of Education is relatively brief.

I came there myself in 1970, and we began the program that you are reviewing here today really in 1971.

The authorized ceiling is $25 million annually, but in fact under the 416 authority have ranged between $5.5 million and $12.5 million during those years between 1970 and 1977.

Annually, then, the amount of money that has been provided for evaluation studies under that authority to cover all Office of Education programs has typically been about one-tenth of one percent of the total Office of Education appropriations.

It is also important, I think, in this committee's review of these activities, to understand that while that is the case with respect to those numbers and funds in the GEPA 416 authority, in fact, the Office of Education has been provided with significant additional funds in recent years outside that authority for evaluation by means of a series of setasides from other program authorities.

The largest one, of course, is in Title I. The actual amount of funds that we have had available to design and carry out evaluation studies of Office of Education Programs, the more than 100 authorized and appropriated programs, has, as Mr. O'Keefe indicated at the outset, been in the neighborhood of $17 million, so that the set aside funds from authorities other than the GEPA 416 have actually in recent years exceeded in amount the funds provided under that basic evaluation authority.

Looking ahead a little bit to one of the points that I wish to make at the end of my testimony, and looking at some of the problems we face, I indicate that in my judgment this presents something of a patchwork arrangement of authorities and funding sources and suggest that both the committee and the administration may wish to consider some streamlined system of authority and funds for the evaluation of education programs, possibly through a general percentage setaside across all programs.

I do think it is important to say to the committee that, at least in my personal judgment, an authority like GEPA 416 or the programmatic setasides I have spoken of, both of which provide authorities and funds for evaluation studies, is a crucial element in the Office of Education program structure. That is to say, I think it is vitally important that the Office have some authority and some adequate source of funds to design and conduct objective, empirical evaluations of effectiveness of educational programs which, if left to the salary and expense account, would not get done as adequately.

It seems to me if the Congress and the Administration jointly are going to take seriously the guidelines of the new budget act, the increasing concern this committee is now showing to make decisions about reauthorization and program effectiveness on the basis of evidence, the administration's efforts in zero-based budgeting, and so on, that a solid evaluation capability is absolutely essential.

By way of a general recommendation, I would hope the committee would conclude that some authority like this, and the ability for it to provide funds for these activities, is vitally important for the kinds of information, if properly carried out, an evaluation function is capable of producing.

I would like to turn now to a brief summary of what we have done with this authority and these funds, and how we go about carrying out evaluations. As I indicated in my testimony, through other prior experience I have had in other federal programs and agencies with evaluation, it seems to me that very often evaluation is an informal ad hoc, activity. Often studies are begun in a general, poorly focused way, and are not properly designed or overseen by way of competent monitoring. The result all too often has been the production of voluminous, often irrelevant, and unfortunately untimely reports which do not get read by, cannot be understood by, and are therefore not used by decision makers, either in the Executive Branch or in the Congress.

These lengthy and esoteric reports go on the shelf unused, and, worse, in my judgment, they contribute to an unfortunate view or evaluation, namely, that it cannot be useful in the decision making and resource allocation process.

Given this unfortunately true characterization of the history of many evalution activities in the Federal Government, I undertook in the Office of Education to develop a mechanism that would try to deal with these problems.

What we have done is to develop a professional staff of technical evaluators in the Office of Education, people with advanced training and degrees in sampling, experimental design, educational measurement, and quantitative analysis.

An important part of our procedure is the fact that we design the evaluations of education programs in-house by our own technical staff. We have the work carried out by either academically connected research institutes or commercial research organizations, but the design that we prepare for an educational evaluation by the technical staff in OE is then converted into a Request For Proposal, and the work to carry out the evaluation is contracted out through the Federal Government standard competitive procurement process. We do not use sole-source contracts or grants. The work is prescribed by us in considerable detail, as to what kind of issues it should focus on, what kind of data should be gathered, and the like.

Once the work is begun, it is overseen in very close detail by the technical staff person who designed the evalution at the outset in OE.

After the study has been completed, there is the extremely important and extremely difficult task of commnicating the evaluation results. It is also my experience that even when we are smart enough and lucky enough to design and carry out a policy-relevant and methodologically sound evaluation of an education program, the task of getting its results into the minds and hands of decision makers, both in the Administration and the Congress, is very difficult indeed. The inertia of the system and the preferences of constituents are very strong, and the evaluation findings have a way of being seen as interesting but not compelling or requiring changes in regulations, budgets, or laws.

What we have done, in an effort to try to better communicate the findings and provide a better basis for action at all levels, is to—as soon as an evaluation is completed—develop a plain-language summary of its results, and we send this to all members of both authorizing and appropriation committees in both the House and the Senate.

These summaries are also sent to the appropriate places within the Executive Branch, that is, to the program offices, to the Commissioner, to Mr. O'Keefe's and Mr. Relic's offices, to OMB, the Domestic Council, and the like.

I think we have taken some useful and, I hope, helpful steps in the direction of communicating the results of evaluation to the people who are in a position to take actions on them, and towards communicating results in a way which is timely and understandable.

It is my impression, though, having now done that for over a year, that as helpful as I think that may have been, it is still not enough. The members of these committees and other decisionmakers are so inundated with materials and analyses from all sources that we are all very often a victim of the urgent driving out the important. We plan to take another step in the area of increased communication of evaluation findings by conducting a series of oral briefings for committee staff. We intend to begin these fairly soon, which we hope will help even more to bring the results of these evaluations to the attention and use of committee members and others.

Mr. QUIE. May I ask you about an evaluation I have been looking forward to that was authorized in the 1974 amendments. We required there be an evaluation report of Title I containing data as to who is served and who is not with regard to economic and educational deprivation. That was 35 months ago. I was wondering whether we could expect to get the report.

Dr. EVANS. We have taken that requirement very seriously and we have incorporated the study designed to collect that data with another one. The data have been collected. They are precisely on the issues and questions you have raised, and in discussion with Mr. Cross and others on the committee we have indicated that we expect to have the basic preliminary data from the contractor next month, so that some basic tables on that will be available next month.

Mr. QUIE. So in September,then, we could get some information?

Dr. EVANS. Yes, sir, that is correct.

Mr. HEFTEL. Dr. Evans, I think Mr. Mottl has a question he would like to address to you.

Mr. MOTTL. Thank you, Mr. Chairman.

Not that I would like to proffer a question at this time; I would just like to welcome a good friend of mine, Dr. Peter Relic, who was on before. I want to apologize for not being here earlier. We had a markup on the Veterans' Education Benefits Bill that I am a sponsor of. I am sorry I could not be here to listen to your testimony. I had a chance to read it; it is excellent.

Dr. Relic I know will do an outstanding job. He was a great football player against my school, and he was a great superintendent of schools in Hamilton. We are looking forward to great things with the Department of Education at HEW, and I know we are going to see great things from Dr.Relic. I just want to join in welcoming you here this morning.

Mr. HEFTEL. Are you sure you do not have any questions?

Mr. MOTTL. Not at this time, thank you, Mr. Chairman.

Dr. RELIC. It is very easy for Mr. Mottl to be gracious when his team beat us 40 to nothing.

Mr HEFTEL. Dr. Evans, it is apparent that we hold our hearings and make our budget program recommendations before we receive your evaluation reports. As an example, we are targeting programs for this year for which we will not have your evaluations until March of 1978. Have you looked into this obvious conflict? You make the decision before you make the evaluation, which says either you do not need the evaluation and should stop spending money on it, or should change the system so you have the evaluation before you make the decision.

Dr. **Evans**. That is a very good point, Mr. Chairman, and I have tried to speak to that in my testimony. I have discussed that problem at considerable length with the staff members of this committee and have acknowledged the problem to which you are alluding. All I can say is that we are in the process of making every effort we can to make our evaluations more timely.

In explanation and elaboration of the present situation, I would take note of the fact that the design and conduct and completion of these evaluations is a very difficult matter. At the conclusion of my written testimony I allude to some of the severe problems we are facing now in the way of getting forms and questionnaires cleared. Right now we have, through law, two major requirements for review and clearance of all forms. In addition, there are internal administrative clearances, as well as reviews by committees of the Council of Chief State School Officers, as you know, because this committee has been deeply concerned with the problem, there is broad-scale concern throughout the country with educational data burden and the need to scale that back. While that represents a valid concern and a good deal is being done about it, the efforts to do that have raised very serious problems and delays for us in getting the mandated studies and other general nonmandated studies completed.

At the present time we figure that for any given evaluation study, reviews and clearances consume a minimum of six months. If there is a hangup in that process somewhere and we miss the data-gathering point at the beginning of an academic year where our evaluation design calls for pre-post measures in the Fall and in the Spring, it means we may lose the entire year.

That said, notwithstanding, the point you have made still is a valid one, and I want to underscore the point that, despite these problems, this year, I think for the first time, we have been able to provide your committee relatively early on in its reconsiderations of the Elementary and Secondary Education Act, comprehensive evaluation studies on Title I, Title VII and the Emergency School Aid Act and Follow Through.

I have provided in my testimony a schedule of some additional findings that will be forthcoming. My answer to your question in sum, Mr. Chairman, is that the point you make is a valid one. Since I am personally concerned with seeing evaluation findings impact on decisions and have effects on legislation and budget, I am as much concerned about that problem as you are. Late evaluations are not likely to be useful, and we are taking what steps we can to make them more timely. I feel there is some evidence this year that there is beginning to appear some success in our efforts, although you are quite right, we still need to improve.

Mr. **Heftel**. Dr. Evans, you indicate that the school districts or departments of education for a state are resistant to your requests for information and are obviously complicating or elongating the process.

What kind of indictment is it, if any, that the districts resist your data-collecting process and do not believe it to be either valuable or warrant the time and energy that goes into it?

Dr. Evans. I would not quite agree with the description of the situation that you have provided, Mr. Chairman. There is a broadscale resistance to all kinds of data collections, as I have indicated before, but in the case of our evaluation studies, by working with the CEIS committee, the Committee on Evaluation and Information Systems of the Council of Chief State School Officers, we have been successful in the vast majority of cases in getting most schools and school districts in the samples of our evalutions to cooperate with us and provide the data we need.

The reaction on the part of the schools is a general one, not one specifically aimed at our evaluations. We have had some particular cases where there has been some hard resistance or refusal to cooperate, but I would not characterize the problem we have as one that is specifically provoked by or focused on our evaluation studies. It is one where the schools feel that in terms of civil rights compliance data, in terms of general statistical activities, audits, research projects as well as evaluations, they are simply being asked and in somne cases required to provide more data than their facilities can support.

In our case, we have taken steps in almost all our studies to provide funds to defray the cost of data collection at the local level either by sending in staffs to do it or in some cases paying teachers for the time they put in. I think if you in the course of your hearings have occasion to make inquiries to the Council of Chief State School Officers, you will find our relationships with them are pretty good and that the state of cooperation in data collection is good.

Mr. Heftel. There still is what appears to be a serious problem in terms of the districts and their overall attitude toward the Federal data processing of forms, the systems, whatever it is we as a Federal bureaucrcy have developed to go hand in hand with the funding process.

To what extent, regardless of how it focuses on you, isolated from the test of the process, ar we diminishing the effectiveness of our funds and alienating the systems we are supposed to be helping?

Dr. Evans. I do not know if there is a fully satisfactory answer to that question. It is one of those dilemmas that is hard to escape. If the Federal Government were to abandon all its data-collection efforts in the area of education, that, I think, would make all the school systems and educators in the country very happy. It would do away with scrutiny and accountability, and it would make their lives much simpler and much less problematic. On the other hand, if we did that, it seems to me the concerns of this committee and the concerns of the Executive branch for information of the kind that you have mandated in a number of specific Acts—information of the kind you need to make judgments about Acts and programs would not be availble.

The only way that information can become available is through the kinds of studies that my office carries out. These studies require some degree of cooperation on the part of local schools to help us collect the needed data.

I do not think that we can ever make both the needs for information for decision making on the one hand, and the desire to be unencumbered and not bothered on the other, fully compatible. We will just have to do the best we can to minimize the inappropriate, redundant, and unnecessary collection activities. I would say that there are a large number of efforts underway to try to do that very thing.

Mr. **Heftel**. I think that was helpful to focus on, namely, should we reduce the data-processing requests system to that point where first we get the information in a timely fashion and do not ask for more information than we will in fact get in a timely fashion; and second, eliminate that overburdensome process that the schools are resisting and which you acknowledge are not satisfying your needs for timely reporting to our comittee.

Dr. **Evans**. I think there is no question, Mr. Chairman, but what that general prescription of the answer to the problem is correct. The difficulty is in identifying the implementation of that answer. When one comes to a particular piece of information there is likely to be different judgments about its necessity.

Dr. **Relic**. Would it be appropriate for me to respond to that question?

Mr. **Heftel**. Certainly.

Dr. **Relic**. I think at the local level our problem always has been we are inundated by so many requests virtually at the same time. When we are asked to comply with the Office of Civil Rights 101 and 102 regulations, at the same time we are updating Title IX on equal educational opportunity for women, at the same now inundated with the 504 regulation on the handicapped, then it is also time for Title I evaluation, we are persuaded to say: Let's do the first things first and that which will have the greatest impact on the district.

It is, first of all, a question of being inundated by so much at virtually the same time. I would say if it has true impact, we would be glad to cooperate. Therefore, when a Title I evaluation tells us we should not be using our Title I aides to supervise non-Title I children in the background, instead of saying this is why your good programs are working and this is why the bad programs are not, at that point it gets exasperating, I would state, at the state level and the local level. The government should make a sincere effort to reduce the paperwork burden. We could handle all evaluations that are truly germane to the needs of the schools, meaning improving program effectiveness.

Mr. **Heftel**. I think we are going to have to adjourn and reconvene in approximately 15 minutes.

Mr. **Pressler**. May I just get one question in?

Mr. **Heftel**. I will turn the chair over to you.

Mr. **Pressler**. What role does the Legislative Relations Office play with respect to evaluation to assure the issues of concern to Congress are addressed in a timely fashion?

Dr. **Evans**. I might answer that question partially, Mr. Pressler. Within the Office of Education we do have an Office of Legislation which is headed by Dr. Alford, who is sitting back here. That office works very closely with my office and with its corresponding office in the department as well as with the other two offices that are represented here at the table today. One of the most prominent ways in which it relates to the question you asked is that one of the requirements, as you may know, is for an annual report called the Renewal Evaluation Report. This annual Renewal Evaluation Report was initiated to do pretty much what your question was aimed at, namely, to have the Administration come forward with a summary of what we know about the effectiveness of a given program, coupled with legislative recommendations on what should happen in that program.

I have to say in all candor, that has been very difficult to do in some cases because sometimes even when we have had evaluation results the Administration has not been able to complete its analyses and judgements as to what legislation should be recommended. But there are several formal provisions, including that annual Renewal Evaluation Report, for trying to bring together evaluation findings and their relationship to legislative recommendations.

Mr. **Pressler**. I am under the gun to go vote. I am going to leave questions and ask the counsel to ask them for me while I am gone.

Mr.**Jennings**. Congressman Heftel wanted to apologize for having to leave. The farm bill is on the floor. He has an amendment which will be one of the first amendments up.

There are a series of other questions that we would like to ask before the hearing is concluded. Dr. O'Keefe, in your statement where you give the breakdown of funds used by level within HEW for planning and evaluation, is that just the 416 money, or all for money evaluation of education programs within the Education Division?

Mr. O'**Keefe**. I regret that was not clear in the statement. Those include all of the dollars that are administered by the various levels.

As I indicated in my statement, the items listed under the Assistant Secretary for Planning and Evaluation are just that section, as Dr. Evans indicated in his statement, the bulk of those funds come from program's specific evaluation authority setasides, and so forth.

Mr. **Jennings**. Could you also provide for the record a similar chart showing the staff distributions between the two divisions with the same format over the same number of years, how many people have been hired for each division over those years?

Dr. O'**Keefe**. Are you asking for total numbers for each of those?

Mr. **Jennings**. Total numbers for each unit at each level over those years.

Could you also provide for the record summaries of the four policy statements which you mentioned in your statement as major policy evaluations which are done by your office?

[A letter from Chairman Carl Perkins and the response from Dr. O'Keefe follows:]

July 21, 1977

Dr. Michael O'Keefe
Deputy Assistant Secretary for
Planning and Evaluation/Education
Department of Health, Education,
and Welfare
Washington, D.C.

Dear Dr. O'Keefe:

You were asked at today's hearing to supply some additional information for the hearing record. The two questions you were asked in particular were the following:

1. Since you gave us an overview of the resources available to each of these three different levels in the Department of H.E.W. for the purpose of planning and evaluation, we would appreciate receiving for the record the same type of chart showing the staffing distribution among these three levels over the same number of years.

2. You mentioned in your statement four major policy studies which your office has funded in the area of education, could you please provide us for the record summaries of each one of those studies?

We would appreciate very much receiving your response by August 5th. Thank you very much for your appearance today. From what I understand, the hearing was very productive and I am sure that it will be helpful to the members as we revise all of these programs.

Sincerely,

Carl D. Perkins
Chairman

CDP:Jp

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

August 1, 1977

The Honorable Carl D. Perkins,
  Chairman
Subcommittee on Elementary, Secondary
  and Vocational Education
Committee on Education and Labor
House of Representatives
B-346C Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Perkins:

Thank you for your letter of July 21st. I am pleased to supply the requested information for the hearing record.

1. The requested staff distribution chart is attached.

2. With regard to the four studies I mentioned in my testimony, let me briefly comment on each.

   a. Patterns of Federal Aid to School Districts. This study is being updated using 1974-1975 data. It will be submitted to the Congress as part of the NIE evaluation of the Title I program mandated under Section 151 of P.L. 93-380. As such, it will be available to the Congress in developing the ESEA reauthorization for the major elementary and secondary programs.

      A summary of the original study is attached, and copies of the complete report are available from me if you so desire.

   b. A Federal Role in the General Program of School Finance

      This analysis was based on 1970 data from State school finance systems. An update of this study that describes the State school finance picture for 1975 will be available in the Fall. It will present the most current information available on (1) the extent to which school finance reform efforts during the 1970's have lessened intrastate inequalities in school district expenditures, (2) the characteristics of districts benefitting from changes in State education aid reforms during the 1970's, and (3) the costs of eliminating existing intrastate inequalities in education finance systems at alternative equalization levels.

      A summary of the original study is attached, and copies of the complete report are also available.

c. A Study of Impact Aid

This study is being carried out in-house as part of our efforts to examine Impact Aid for the legislative reauthorization currently underway. It is anticipated that the report will be completed by the end of October, at which time of course, it will be made available to you.

d. College Choice Under Modifications of the BEOG Formula

This study is currently nearing the final stages of completion. It is anticipated that the final report will be completed within two months.

The study is a comparison of two models that have different statistical approaches to simulations of the college going/ college choice decisions. The purpose is to evaluate the methods of simulation used by each of the models. The comparison is to be based upon statistical methodology, convenience, expense, flexibility and accuracy of results.

The results of the study can be seen as an important step toward a more accurate assessment of the response of enrollment to changes in the BEOG award rules. This study also illustrates the importance of prices in determining the changes in total enrollment and how those changes are distributed among the various kinds of institutions. This result, in turn, has an impact on the relative financial position of the private institutions.

I agree the hearing was very productive and I look forward to continued cooperation in the future. If I can be of any further assistance, please do not hesitate to call on me.

Sincerely,

Michael O'Keefe

Michael O'Keefe

Evaluation Personnel

The tables below show the total staff distributions for OE/OPBE, ASPE/EP, and the immediate office of ASE. These figures are estimated annual averages, and include permanent and temporary personnel, broken down by professional and support staff. Total person-years for evaluation activities are given under each Table.

	74	75	76	77	78 Est.
OE/OPBE					
Prof.	30	33	34	38	38
Supp.	11	12	14	14	14
Total	41	45	48	52	52

It is estimated that 10-15% of professional staff time is not directly related to evaluation activities. Thus approximately 45 person-years are currently devoted to evaluation.

ASPE/EP					
Prof.	12	16	20	20	20
Supp.	3	4	4	4	4
Total	15	20	24	24	24

Only about 20-25% of ASPE/PE staff time is devoted to evaluation activities. Thus about 5 person-years are currently involved in evaluation.

ASE					
Prof.	26	27	28	29	28
Supp.	20	19	21	22	22
Total	46	46	49	51	50

For each year, the total number of professional staff directly involved with the work of the EPRC's is 5, and approximately 3 person-years are spent on EPRC activities.

Mr. **Jennings**. Dr. Relic, if you could provide for the record more information on the policy centers. You stressed in your statement that the policy centers were very important to the efforts of the Assistant Secretary's office. What I think would be useful would be to tell us how many policy centers there are. I think you said four, but I think that has fluctuated over the years.

Also, how much money has gone to each policy center over that period of time, what exact work they have done for the Assistant Secretary's office, and, most importantly, what effect any of that work has had in policy issues within HEW. I think that would be useful information.

[The information from Dr. Relic follows:]

I. Description of the ASE
Education Policy Research Centers (EPRCs)

After the Office of the Assistant Secretary for Education was created and assigned responsibility for policy leadership in education, two Education Policy Research Centers (EPRCs) were transferred in December, 1973 to ASE from OE. Under ASE direction the range of areas for analysis at each center has been more sharply defined. Now there are three EPRCs focusing on the following areas:

- Stanford Research Institute, Menlo Park, California is responsibile for policy analyses in the areas of compensatory education, handicapped education, and desegregation.
- The Rand Corp., Washington, D.C., is responsible for educational governance and school finance issues.
- Joseph P. Froomkin, Inc., Washington, D.C. does analyses in the areas of higher education, adult education, and education and work.

The EPRCs are funded through contracts awarded on a competitive basis by the Policy Development Office in ASE (ASE/PD). The centers are designed to provide in-depth analyses of education policy of direct use to the Assistant Secretary and other education decision makers. Thus, the EPRCS provide a link between in-depth policy analysis efforts and the shorter term in-house capability of ASE/PD. The continuity provided by the Centers allows them to accumulate considerable expertise and experience in their assigned areas. With this arrangement the Federal government is able to obtain a higher return in analysis products for its investment than it would if the same services were procured through a large number of separate contracts.

II. Examples of How EPRC Work Is Used.

1. SRI recently completed a study entitled Evaluating Long-Term Achievement: An Analysis of Longitudinal Data from Compensatory Education Programs. The study suggested that within-year testing of students was an inadequate measure of achievement in compensatory education programs. We expect this study to have a significant impact on the way evaluators look at these programs in the future.

2. Last January SRI prepared an Analysis of the Office of Education's Proposed Rules for the Identification of Children with Sepcific Learning Disabilities under the Education for All Handicapped Children Act (P.L. 94-142). The purposes of the study were to review the proposed rules in terms of Congressional intent, the current state of knowledge, and their targeting effects. The findings of this study formed the basis for the ASE and the ASPE positions on that policy issue in the proposed rules. OE is currently drafting final rules which take into consideration the flaws uncovered by this analysis of the proposed rules.

3. Both Rand and SRI are presently engaged in studies, some of them on a quick turnaround basis, which support deliberations of the Department's Task Force on Reauthorization of Education Legislation in the following areas: analysis of Federal fiscal allocation requirements (i.e. supplanting, maintenance of effort, excess costs, comparability), survey of State activities in desegregation, and development of options for differential treatment of the States.

III. Budget History for EPRC's*

Fiscal Year	1973	1974	1975	1976 ** plus Transition Quarter	1977 **
Total	950,000	950,000	950,000	962,000 + 240,000 (T.Q.)	962,000
Syracuse University Research Corp.	550,000	550,000	365,000	0	0
Stanford Research Institute	400,000	400,000	585,000	535,300	297,000
The Rand Corp.	0	0	0	303,500	358,000
Joseph P. Froomkin, Inc.	0	0	0	363,700	307,000

*The EPRC contracts are awarded every three years on a competitive basis. The change in Centers funded in FY 1976 reflects the results of the competition.

**The three centers are level funded at an annual rate of $297,000 for SRI, $330,000 for Rand and $307,000 for Joseph Froomkin, Inc. The FY breakdowns do not reflect this due to (1) the distribution of transition quarter monies and (2) the timing of the contractual awards.

IV. EPRC Publications

1. STANFORD RESEARCH INSTITUTE

Title: Improving Compensatory Education Through Changes in ESEA Title I
Author(s): EPRC Staff
Date: May 1977

Title : Some Consequences of Black Population Changes for Desegregation Remedies
Author(s): Henry Acland and John Lee
Date: April 1977

Title: Evaluating Long-Term Achievement: An Analysis of Longitudinal Data from Compensatory Education Programs
Author(s): Sol H. Pelavin and Jane L. David
Date: March 1977

Title: Analyses of the Office of Education's Proposed Rules for the Idenfification of Children With Specific Learning Disabilities Under the Education for All Handicapped Children Act
Author(s): Patricia A. Craig and Mary A. Mayloire
Date: January 21, 1977

Title: The Economic Effects of Cognitive and Educational Differences Among Low-Ability and Blue-Collar Origin Men: A Comparative Analysis
Author(s): Michael R. Olneck
Date: November 1976

Title: Compensatory Education and Early Adolescence: Reviewing Our National Strategy
Author(s): Meredith A. Larson and Freya E. Dittman
Date: May 1976

Title: Federal Policy for Preschool Services: Assumptions and Evidence
Author(s): Meredith A. Larson
Date: May 1976

Title: Patterns in ESEA Title I Reading Achievement
Author(s): Thomas C. Thomas and Sol H. Pelavin
Date: March 1976

Title: Studies of Handicapped Students Volume I: Whom Do Teachers Identify As Handicapped?
Author(s): Patricia A. Craig and Norman B. McEachron
Date: December 1975

Title: An Alternative Supplementary Educational Opportunity Grant Program: Analysis of State and Institutional Distributions
Author(s): Daryl Carlson and John Lee
Date: November 1975

Title: The Development of the Data Base for "Student Aid: Description and Options"
Author(s): Ann M. Hershberger and others
Date: November 1975

Title: Student Aid: Description and Options
Author(s): John B. Lee, Daryle E. Carlson and others
Date: October 1975

Title: Planning for the Future and Its Impact Upon the Data Acquisition Process
Author(s): Thomas C. Thomas and Peter Schwartz
Date: August 1975

Title: Major Trends in Educational Development 1973 to 1975
Author(s): EPRC
Date: January 1975

Title: Subcounty Allocation of ESEA Title I Funds
Author(s): Thomas C. Thomas and Stephen I. Kutner
Date: January 1975

Title: State Compensatory Education and Bilingual Programs
Author(s): Mary Pat Pfeil
Date: February 1975

Title: The Use of Performance Criteria to Allocate Compensatory Education Funds
Author(s): James Guthrie
Date: July 1974

Title: Survey of Federal Educational Program and Data Sources
Author(s): Linell Janowitz
Date: March 1974

2. THE RAND CORPORATION

Title: A Federal Role in the General Program of School Finance
Author(s): Lawrence L. Brown III and Alan L. Ginsburg
Date: March 1977

Title: Federal Assistance to National Target Groups: The ESEA Title I Experience
Author(s): Robert J. Goettel
Date: March 1977

Title: Policy Issues in Cost and Finance of Special Education
Author(s): J.S. Kakalik
Date: March 1977

Title: The Courts as Educational Policymakers and Their Impact on Federal Programs
Author(s): Betsy Levin
Date: March 1977

Title: Federal Education Goals and Policy Instruments: An Assessment of the "Strings" Attached to Categorical Grants in Education
Author(s): Stephen Barro
Date: February 1977

Title: The Federal Role in School Financing: A View from the States
Author(s): John J. Callahan and William H. Wilken
Date: January 1977

Title: Federal Aid to Education: Prologue and Prospects
Author(s): Michael Timpane
Date: January 1977

Title: Teacher Collective Bargaining and School Governance
Author(s): Lorraine McDonnell
Date: December 1976

Title: Accountability: What is the Federal Role?
Author(s): M. Kirst and G. Bass
Date: June 1976

3. JOSEPH P. FROOMKIN, INC.

Title: Adult Education 1972, Re-Analysis
Author(s): Joseph Froomkin and R. J. Wolfson with the assistance of Clinton McCully
Date: May 1977

Title: Full-Time Faculty in Higher Education -- Numbers, Ages, Wages
Author(s): Joseph Froomkin
Date: April 1977

Title: Comments on Possible Policy Research Uses of Four Major Longitudinal Data Bases
Author(s): David Selby
Date: March 1977

Title: A Review of Financial Developments in Higher Education 1970/71 - 1974/75, and a Prognosis for 1980-1985
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I. Description of the ASE Education Policy Research Centers (EPRCs)

After the Office of the Assistant Secretary for Education was created and assigned responsibility for policy leadership in education, two Education Policy Research Centers (EPRCs) were transferred in December, 1973 to ASE from OE. Under ASE direction the range of areas for analysis at each center has been more sharply defined. Now there are three EPRCs focusing on the following areas:

- Stanford Research Institute, Menlo Park, California is responsibile for policy analyses in the areas of compensatory education, handicapped education, and desegregation.
- The Rand Corp., Washington, D.C., is responsible for educational governance and school finance issues.
- Joseph P. Froomkin, Inc., Washington, D.C. does analyses in the areas of higher education, adult education, and education and work.

The EPRCs are funded through contracts awarded on a competitive basis by the Policy Development Office in ASE (ASE/PD). The centers are designed to provide in-depth analyses of education policy of direct use to the Assistant Secretary and other education decision makers. Thus, the EPRCS provide a link between in-depth policy analysis efforts and the shorter term in-house capability of ASE/PD. The continuity provided by the Centers allows them to accumulate considerable expertise and experience in their assigned areas. With this arrangement the Federal government is able to obtain a higher return in analysis products for its investment than it would if the same services were procured through a large number of separate contracts.

II. Examples of How EPRC Work Is Used.

1. SRI recently completed a study entitled Evaluating Long-Term Achievement: An Analysis of Longitudinal Data from Compensatory Education Programs. The study suggested that within-year testing of students was an inadequate measure of achievement in compensatory education programs. We expect this study to have a significant impact on the way evaluators look at these programs in the future.

2. Last January SRI prepared an Analysis of the Office of Education's Proposed Rules for the Identification of Children with Sepcific Learning Disabilities under the Education for All Handicapped Children Act (P.L. 94-142). The purposes of the study were to review the proposed rules in terms of Congressional intent, the current state of knowledge, and their targeting effects. The findings of this study formed the basis for the ASE and the ASPE positions on that policy issue in the proposed rules. OE is currently drafting final rules which take into consideration the flaws uncovered by this analysis of the proposed rules.

3. Both Rand and SRI are presently engaged in studies, some of them on a quick turnaround basis, which support deliberations of the Department's Task Force on Reauthorization of Education Legislation in the following areas: analysis of Federal fiscal allocation requirements (i.e. supplanting, maintenance of effort, excess costs, comparability), survey of State activities in desegregation, and development of options for differential treatment of the States.

III. Budget History for EPRC's*

Fiscal Year	1973	1974	1975	1976 ** plus Transition Quarter	1977 **
Total	950,000	950,000	950,000	962,000 + 240,000 (T.Q.)	962,000
Syracuse University Research Corp.	550,000	550,000	365,000	0	0
Stanford Research Institute	400,000	400,000	585,000	535,300	297,000
The Rand Corp.	0	0	0	303,500	358,000
Joseph P. Froomkin, Inc.	0	0	0	363,700	307,000

*The EPRC contracts are awarded every three years on a competitive basis. The change in Centers funded in FY 1976 reflects the results of the competition.

**The three centers are level funded at an annual rate of $297,000 for SRI, $330,000 for Rand and $307,000 for Joseph Froomkin, Inc. The FY breakdowns do not reflect this due to (1) the distribution of transition quarter monies and (2) the timing of the contractual awards.

IV. EPRC Publications

1. STANFORD RESEARCH INSTITUTE

Title: Improving Compensatory Education Through Changes in ESEA Title I
Author(s): EPRC Staff
Date: May 1977

Title : Some Consequences of Black Population Changes for Desegregation Remedies
Author(s): Henry Acland and John Lee
Date: April 1977

Title: Evaluating Long-Term Achievement: An Analysis of Longitudinal Data from Compensatory Education Programs
Author(s): Sol H. Pelavin and Jane L. David
Date: March 1977

Title: Analyses of the Office of Education's Proposed Rules for the Idenfification of Children With Specific Learning Disabilities Under the Education for All Handicapped Children Act
Author(s): Patricia A. Craig and Mary A. Mayloire
Date: January 21, 1977

Title: The Economic Effects of Cognitive and Educational Differences Among Low-Ability and Blue-Collar Origin Men: A Comparative Analysis
Author(s): Michael R. Olneck
Date: November 1976

Title: Compensatory Education and Early Adolescence: Reviewing Our National Strategy
Author(s): Meredith A. Larson and Freya E. Dittman
Date: May 1976

Title: Federal Policy for Preschool Services: Assumptions and Evidence
Author(s): Meredith A. Larson
Date: May 1976

Title: Patterns in ESEA Title I Reading Achievement
Author(s): Thomas C. Thomas and Sol H. Pelavin
Date: March 1976

Title: Studies of Handicapped Students Volume I: Whom Do Teachers Identify As Handicapped?
Author(s): Patricia A. Craig and Norman B. McEachron
Date: December 1975

Title: An Alternative Supplementary Educational Opportunity Grant Program: Analysis of State and Institutional Distributions
Author(s): Daryl Carlson and John Lee
Date: November 1975

Title: The Development of the Data Base for "Student Aid: Description and Options"
Author(s): Ann M. Hershberger and others
Date: November 1975

Title: Student Aid: Description and Options
Author(s): John B. Lee, Daryle E. Carlson and others
Date: October 1975

Title: Planning for the Future and Its Impact Upon the Data Acquisition Process
Author(s): Thomas C. Thomas and Peter Schwartz
Date: August 1975

Title: Major Trends in Educational Development 1973 to 1975
Author(s): EPRC
Date: January 1975

Title: Subcounty Allocation of ESEA Title I Funds
Author(s): Thomas C. Thomas and Stephen I. Kutner
Date: January 1975

Title: State Compensatory Education and Bilingual Programs
Author(s): Mary Pat Pfeil
Date: February 1975

Title: The Use of Performance Criteria to Allocate Compensatory Education Funds
Author(s): James Guthrie
Date: July 1974

Title: Survey of Federal Educational Program and Data Sources
Author(s): Linell Janowitz
Date: March 1974

2. THE RAND CORPORATION

Title: A Federal Role in the General Program of School Finance
Author(s): Lawrence L. Brown III and Alan L. Ginsburg
Date: March 1977

Title: Federal Assistance to National Target Groups: The ESEA Title I Experience
Author(s): Robert J. Goettel
Date: March 1977

Title: Policy Issues in Cost and Finance of Special Education
Author(s): J.S. Kakalik
Date: March 1977

Title: The Courts as Educational Policymakers and Their Impact on Federal Programs
Author(s): Betsy Levin
Date: March 1977

Title: Federal Education Goals and Policy Instruments: An Assessment of the "Strings" Attached to Categorical Grants in Education
Author(s): Stephen Barro
Date: February 1977

Title: The Federal Role in School Financing: A View from the States
Author(s): John J. Callahan and William H. Wilken
Date: January 1977

Title: Federal Aid to Education: Prologue and Prospects
Author(s): Michael Timpane
Date: January 1977

Title: Teacher Collective Bargaining and School Governance
Author(s): Lorraine McDonnell
Date: December 1976

Title: Accountability: What is the Federal Role?
Author(s): M. Kirst and G. Bass
Date: June 1976

3. JOSEPH P. FROOMKIN, INC.

Title: Adult Education 1972, Re-Analysis
Author(s): Joseph Froomkin and R. J. Wolfson with the assistance of Clinton McCully
Date: May 1977

Title: Full-Time Faculty in Higher Education -- Numbers, Ages, Wages
Author(s): Joseph Froomkin
Date: April 1977

Title: Comments on Possible Policy Research Uses of Four Major Longitudinal Data Bases
Author(s): David Selby
Date: March 1977

Title: A Review of Financial Developments in Higher Education 1970/71 - 1974/75, and a Prognosis for 1980-1985
Author(s): Joseph Froomkin and Clinton McCully
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Mr. **Jennings**. Dr. Evans, again to go back to the timeliness issue, which is an old continuing discussion, you have provided evaluations which have been very useful to the committee, and I think all the members of the committee realize that in these different sets of hearings, this bilingual evaluation and certain others have been useful. Some of those evaluations certainly focused the issues, whether or not the members agreed or disagreed with them, in order to get a good debate on what the issues were.

In your statement you say your major evaluation reports remaining on programs which are going to expire are going to be available by March of 1978. Again, how is that going to be of much use to the Congress or to the planning process within HEW, which I understand is going on right now, where planning papers are coming up right now in order to provide useful information to HEW and to the Congress in renewing this legislation?

Dr. **Evans**. I would just respond to that, Mr. Jennings, by noting that the reports which I indicated in my testimony are going to be forthcoming by March 1978 are largely supplementary reports to the ones that we have already provided. That is, I do not think that the additional reports we will be sending forward, with one or two exceptions, will change the fundamental conclusions that we have already provided the committee on the programs that it is reviewing. As I said, the fundamental conclusions about the effectiveness of Title I, which you are familiar with and I think we need not review here, the basic conclusion on the Emergency School Aid Act that we reviewed in testimony fairly recently, the basic findings findings on bilingual education, and the recent summary that we have sent up on the Follow-Through program, all of those findings will not be altered by reports that we will be sending as a matter of follow-on between now and March. I would say that we have provided, and I think in a timely way, the essential conclusionary findings from major evaluations on those major programs.

It would be certainly appropriate if we could have provided our findings on the national diffusion network, but we may be able to have some preliminary findings before March.

The same thing is true on the portion of Title I that has to do with the neglected and delinquent. We simply were not able to complete that study in time, and it will come at a time that may be later than would be desired.

Again, all I can say is that which I have said before, that the matter of timeliness is crucially important, and the points you have made are absolutely right. My office has made and is continuing to make major efforts to redress that problem. I think we have made some significant progress toward it. We are going to have some findings, regrettably, that relate to the business of this committee which may come too late to really influence a determination of the committee during this round.

Mr. **Jennings**. In that exact regard I would like to know why requests for proposals dealing with the Emergency School Aid Act, the Women's Educational Equity Act, the Title IV consolidated program, the reading program, and the Title I program, all appeared in Commerce Daily in May and June of this year with submission dates for the proposals for July and August of this year, and I presume, since you are going to have to review the submissions for proposals this fall, that the proposals themselves will not be completed for at least a year, which of course will take us beyond the date upon which President Carter signs the Education Amendments of 1978. Undoubtedly there are going to be major revisions in most of these programs, and yet you have ongoing now requests for proposals for studies for programs which are going to be in a major extension.

How can you reconcile that with your statements that you are making efforts to become more timely?

Dr. EVANS. I would say, Mr. Jennings, that that is a very good exemplification of the efforts we are making. Those proposals deal with future cycles. Because the cycle is so long and so much has to be done, the activities that we are trying to produce an ongoing stream of evaluation findings related to the major acts and programs. We have just completed evaluations on most of the proposals you are referring to, such as Title I and the Emergency School Aid Act.

What we have to do now is to plan for the future. In the case of Title I, for example, you may recall that we indicated in our summary of those findings that Title I seems now finally to have achieved a modest degree of effectiveness, at least in the sense that it appears to be redressing the expected and probable decline in the achievement levels of disadvantaged students.

We also noted in those findings that those gains do not appear to be cumulative over the years. It was not possible to determine from that study whether or not that was due to an actual decay or deterioration of the achievement gains made within a year, or whether the cross-year comparisons which failed to show cumulative gains were the result of such facts that Title I only serves half the target population, that oftentimes children who achieve gains are removed from the program, and so on. As a result, we have designed a new study, the study of sustained effects, that will focus on that important issue. This study will not be available in the immediate future but will be available in time to effect future considerations of these programs both within the executive branch and in the Congress.

Mr. JENNINGS. With some of these requests for proposals, I am not so sure that some of these programs may not be modified to a very major extent.

What about the consolidated programs under ESEA?

You put something in the Commerce Daily on May 27 asking for requests for proposals and submissions by July 13, 1977. I understand that that study is expected to last at least a year, and the results probably won't be available for 2 years.

Now if the Congress revises that program in 1978, you are right in the middle of evaluating a program which was one thing, which may become something else, and, therefore, your report, by the time it comes out, will probably be irrelevant to the Congress and to the administration because that program may no longer exist in the form in which it is being evaluated.

Why wasn't that type of evaluation request sent out 2 years ago, or even earlier?

That consolidation went into effect, or was signed on the books in 1974, went into effect in 1975. Here we are in 1977, and in May you are sending out a request for a proposal on it, right before it is going to be reviewed, and the results won't be available until after it has been revised.

Dr. **Evans**. In the case of the Title IV, that was not an instance of neglect or failure on our part. We consciously felt that the gradual phasing in of Title IV, with the different percentage requirements and so on, meant that that program didn't really exist as a program under new State control and administration until fairly recently. And we felt that to carry out an expensive evaluation on a program that was in midstream transition could be properly criticized with developing unclear and not useful information. So we tried to time that evaluation——

Mr. **Jennings**. Pardon me. But to that extent or in that regard, wouldn't it have been useful to have done an evaluation of a change from seven categorical programs to a type of consolidation so that if this is in fact a prototype for what some people contend is going to happen in the future in education programs, wouldn't it have been useful to see what happens in the process of consolidation?

Dr. **Evans**. I suspect it would have been useful, but we had to trade-off that possible study against the many others that are requested by the various program directors in the Office of Education which we were not able to initiate because of inadequate funds. And our decision was that the best and most useful allocation of our limited resources, across a broad array of evaluation studies and requests, didn't include that possibly useful study for that year.

Mr. **Jennings**. How much money is involved in this evaluation?

Dr. **Evans**. Let me ask Mr. Wisler for that.

Mr. **Wisler**. We expect that will run about $350,000.

Mr. **Jennings**. All together in toto?

Mr. **Wisler**. Yes.

Dr. **Evans**. On the second part of your question, Mr. Jennings, given those reasons for making the decisions we made if it should turn out that the Congress this year does as you suspect, make fundamental changes in that law, so fundamental that the scope and character of that evaluation and the program activities that that Act now covers are so greatly changed that the evaluation would be irrelevant, we would have no choice but to either try to alter the scope of that evaluation if that were possible, or if not, to cancel it out. I hope that doesn't happen, and as I say, I am cognizant of the basic question you are raising, and we are trying to do what we can to deal with it.

Mr. **Jennings**. Let me ask you several other questions. I believe you will find that most of the criticisms of what is happening with evaluations comes about from a frustration with what was hoped would comes about from evaluation, namely, giving the Congress better advice on how to revise these programs, and, therefore, I think most of the criticisms are in the nature of a friendly disappointment that the Congress is not getting information which they hoped to get in order to revise these programs, and I hope you take these criticism in that light, because some of the evaluations, I know in a number of the congressmen's minds, could have been very useful to us in this renewal cycle. But it seems like some of these are gone so that they are not going to be of use to the congressmen. A number of them are going to be of use, the ones you pointed out in your testimony are going to be of use, the ones that have already gone into the record. But I would also like to ask you a broader question.

The Congress in the General Education Provisions Act has written in the requirement for an annual evaluation report, and also for a project renewal report. And, again I believe that you find those things in there because congressmen and senators believe that more rational use of scarce dollars could come about if there were a more rational evaluation of how those dollars were being spent.

However, it seems that neither one of those requirements has met the full promise when they were enacted. It seems with the annual evaluation report that it is a useful summation or evaluation studies, as you state in your statement of types of evaluations which are done. But, from what I understand, there has never been an effort as legislatively required to identify the goals and objectives in qualitative and quantitative terms for all the programs and to measure the progress towards achievement of those goals in that annual evaluation report.

That is language which appears in the public law, which is supposed to be one of the principal objectives of the annual evaluation report, and yet it seems that the Office of Education has never tried to do that in the annual evaluation report.

Why has the Office of Education not followed the law in that instance?

Dr. EVANS. It is not that we haven't tried, but it is clear, as you say, that we haven't succeeded. I don't know quite how to give a satisfactory answer to that question, except to say that the nature of many of the laws that exist on the more than 100 education programs often do not prescribe clearly what the objectives should be or what the particular numerical goals should be, and even in some cases where they do, they haven't been translated, as you know, into actual written or behavioral goals.

In other cases, the goals have been by legislative design, lent to local interpretation. In the case of Title I, it is almost totally a locally administered program, and I know that there have been some discussions between the administration and the Congress on the specificity of goals for Title I. But when there have been proposals that the legislation should be sharpened to focus in more clearly on, say, basic skills, some members of Congress have responded that, no, that is not what the law should be. The law should allow local discretion to include other kinds of activities.

So that there seems to be, on the part of the Congress, a desire in many cases to have the general objectives and the particular numerical goals be determined by local educational agencies, not by the Office of Education or by legislation. So in many cases we have just not been able to go to any greater specificity than is now contained in the annual report where we do provide a general statement of goals and objectives and a statement of the aspirations of the law.

Mr. JENNINGS. So you don't believe that the emergency school aid law exists on the books in order to help to ease problems of desegregation; and that is a measureable goal? You don't believe that the Adult Basic Education Act exists on the books in order to help people without basic lieracy to attain that literacy; and that is a relatively simple goal which can be measured? You don't believe that the National Reading Improvement Act exists on the books in order to encourage greater attention towards improving reading skills among students; and that goal can be measured?

Is that what you are saying?

Dr. **Evans**. No.

In the case, for example, of the Emergency School Aid Act, it illustrates the problem that I tried to note, namely, that the three principal goals that are in that Act give the local recipients of funds a fairly broad range of areas to emphasize, and many of them have chosen to emphasize basic skills in reading and math, and that has been the focus of our evaluations, but——

Mr. **Jennings**. You can't say that with a straight face because you know darn well that Dr. Goldberg sent a memorandum to the regional offices telling them, under the last administration, that they were to spend their money under the Emergency School Aid Act for basic skills because the long-term objective of that administration was to repeal that Act and put the money into Title I. And so I find it hard to believe that you can turn that around and say that local people who are told that they were going to get their Emergency School Aid Act money on the condition that they write their applications in terms of basic skills have written their applications in terms of basic skills because they perceive that to be the major goal. I think that that is a very inappropriate example. And when Dr. Goldberg was told that that was an illegal procedure, that that requirement was not in the law, he retracted that memorandum, and so that now the program is supposed to be less focused on basic skills through administrative action. So I find that example to be very inappropriate.

Dr. **Evans**. I don't know what else to say. As you said, when the new correct and broader interpretation of the objectives of that law is in force, it will provide local agencies with a broader range of activities to engage in, and as you, yourself, just said, make inappropriate the specification of precise goals and objectives by the Office of Education.

Mr. **Jennings**. There does not necessarily though have to be one precise goal. You, yourself, have admitted in previous testimony that under the emergency school aid program, that where there was freedom on the part of local administrators to apply for money for whatever purpose; that the first evaluation of that program showed that the human relations aspect of that program was the most effective use of the money.

Then, when the administration under the Emergency School Aid Act forced local people to apply for money to use it for basic skills, you came back in with the second evaluation and said that it seems that human relations are not being used, and that they are not being very effective, and that basic skills are starting to show some results. And so there is a difference because of what happened in the administration of the program. And yet I think it could be reasonable that in an annual evaluation report you could have said, even given this history of an administrative distortion, that if you consider the purpose of the bill to be to ease racial tensions in desegregating situations, that the uses of human relations resources have these effects. If a school district has chosen basic skills as its basic purpose, that it has had these effects.

Why can't you state things in terms of multiplicities of objectives instead of one objective?

Dr. EVANS. We did, and we have tried to do that. I guess that all I can say with respect to your general question is that we are acutely aware of the portion of the law relating to the annual evaluation report that you are speaking of, and we have just not been able to be any more precise about it than we have so far due to conditions of the law, conditions of varying local administration, and the like. If you feel that that it is possible in specific cases to improve that, I would be happy to try to work with you on a direct basis to see what can be done.

We have made some efforts and just have not been able to realistically and honestly write down things that could be said to be prescribed individual numerical goals for most of those programs for the various reasons and problems that I have indicated.

Mr. JENNINGS. Could I also ask you with the renewal evaluation reports, when those have been sent up over the last several years, one of the requirements in those reports is that there be recommendations for improvements in these programs.

Why have those renewal reports which have come up not included recommendations for improvements as required by the legislation?

Dr. EVANS. Let me ask Dr. Alford to speak to that. His office has been preparing those reports.

Dr. ALFORD. I should respond to that.

My office does coordinate in pulling together evaluation reports. Basically we would have to respond that where it does not appear to be recommendations for improvement, we have no suggestions for improvements in the programs at that point. We have, I think, made such suggestions where we do find that there are recommendations to be made.

Mr. JENNINGS. If I remember accurately the number of reports that came up, about 90 percent of them said "terminate the program."

Dr. ALFORD. We had a very easy job of making legislative recommendations for the last several years at least because we were moving to abolish most of the categorical programs and consolidate them into others—but I think you were getting at a little broader aspect of recommendations for modification programs—but I think there we really only dealt with program modifications that would require a change in law because as far as other recommendations of program change, if it doesn't require change in law, we should be doing those internally. And I think we would feel—at least that would be my interpretation of what was needed in the renewal evaluation report.

Mr. JENNINGS. Dr. Alford and Dr. Evans, I think the basic purpose of these provisions—and I think both of you know the legislative histories of them—were to try to help the congressmen and the senators make more rational judgments on these programs. And sometimes between putting something on the books and the reality of it, there is quite a drop so that you don't necessarily achieve what you want to achieve. But again the objectives this time around should be to try to refashion those things so that there can be some realistic assistance given in an organized fashion to Congress so that Congressman Heftel, who is interested in impact aid, will be able to go to an evaluation report which gives him solid information on which he can base his judgments, or if Congressman Corrada is interested in bilingual programs, he can base his judgments on something like that.

If there is any way at all that these can be rewritten to make more sense and to make the process more orderly, I think you would find a great deal of receptivity on the part of the congressmen on this committee. I think it is an attempt to try to find a use for evaluation in the authorization process.

Dr. ALFORD. May I comment that we do take this very seriously in my work with the renewal evaluation reports and would like to make them as useful as possible.

One of the things we may have to examine is the timetable again in connection especially with the Budget Reform Act, which really requires us to get our recommendations to you on the legislative proposals by May 15 of the date prior to the September 30, for example, date of the renewal of the evaluation report. I think we need to iron out some of those date problems as we go through this next renewal phase. But I would want to comment, in backing up Dr. Evans, that my office works very closely with his office. Also in the planning stages. We are very well aware, and we keep tables current on the expiration dates of the laws as they are passed by Congress. And so we go through these regularly trying to develop a plan whereby we can establish the evaluations in a way that they will hopefully come to be reported in time to be used in developing our recommendations there.

We haven't been perfect in this, obviously, in the past, but I think we have improved over the years, and we can hope to improve even more greatly in coming years.

Mr. JENNINGS. I don't think there is any doubt that they have improved, and I think the committee's oversight hearings have shown that this year, where you have provided timely information, which has been of use. But again it is a push, it seems, every year, to try to get you to improve, because one of the things for which you claim credit in your statement, Dr. Evans, was the evaluation of the Title I migratory education program.

Well, that evaluation was delivered to the members of the House and Senate on the day that they finished the conference report on the 1974 education amendments, in which they have rewrote the Migratory Education Act.

Now it may have been of some use to the Office of Education in administering the rewritten law, but it was of no use to the Congress when they were rewriting that law. You cannot give information to congressmen as they are walking to the floor or as they are going to a conference committee. You have to give it to them in subcommittee or before that, because that is where most of the work is done, in subcommittee, and, therefore, it is vital that it not be March 1978. It is vital that it be November 1977 before we start a subcommitte markup.

Dr. O'KEEFE. Mr. Jennings, could I comment on this question of the timeliness of our evaluation work?

I would just like to make the basic point that that issue of timeliness is of as much importance to the Secretary, the Commissioner and the Assistant Secretary for Education as it is to you; that is to say, that the administration in the Executive Branch in formulating its policies and its recommendations has obviously got to take account of a lead time greater than that of the Congress; that is to say, we can hardly bring our administration proposals to you at the last day of the markup on the bill. And so our concerns are equally as strong, if not slightly stronger, that we insure that the work that we are doing is, A, very policy related, that it is informative to those policy questions that we have, and, B, that it comes in in a timely fashion.

I want to assure you that this administration, the new administration, at the top levels of HEW, is very concerned about that, and has a commitment to in fact a continuing improvement of how we do this and of how well it works.

The Secretary has, as I think you are aware, recently requested and instituted a revision of the procurement process and a strengthening of that process to insure a more effective and fair administration of our contracts across the board.

Secondly, under the general aegis of the Assistant Secretary for Planning and Evaluation, we are reviewing the manner in which research, evaluation and planning activities are carried out throughout the department, and, of course, within the education division, to in fact assure that they are coordinated, that they tie into real policy decision, and that they are done in the most effective and sensible fashion.

I just want to assert that our interests as policy analysts, as staff to key policymakers, are entirely parallel with yours. Our concerns are parallel with yours, and in fact slightly anticipate yours because of the manner in which administration and congressional proposals relate to each other.

Mr. JENNINGS. It is good to hear that, but again timeliness is not timeliness when they walk in and write a bill, as you can tell from the absence of the congressmen this morning. Congressmen have an awful life in that they have so many competing demands on their schedule. They are supposed to be at 10 places at one time.

The House is in session now and so nobody is here because they are on a very controversial farm bill with food stamp revisions and everything. The chairman is in the Rules Committe because he is in the black lung bill, and Mr. Quie is in the Ethics Committee. There are so many conflicts on their time that they have to have information far ahead of time so they can take it home and read it and have time to think about it. It cannot be at the last minute as they walk in to make a decision.

If I could ask one other thing, Dr. Evans, you referred in your statement to the problems you have had with your timing of evaluations. And I would like to request, if you could supply for the record, a chart showing the sequencing of the entire evaluation process from the day that you have initiated it, to the clearance procedures you go through, to the day that it finally goes out, and then the results are received back, because I think you have brought out a very important problem that you have with the triple clearance procedure that has to be gone through in order to get a request for an evaluation.

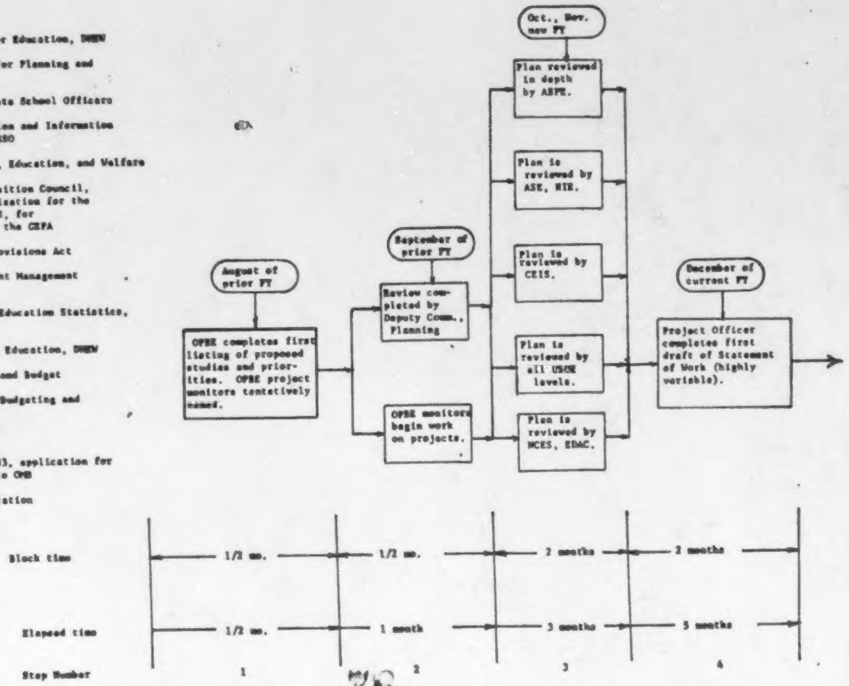
Dr. **Evans**. I am glad to hear that that point has been communicated well, and I would like to urge the committee to continue to be sensitive to it, and I greatly appreciate that. We have such a chart, which we have shed many tears over, and we will be happy to supply it for the record.

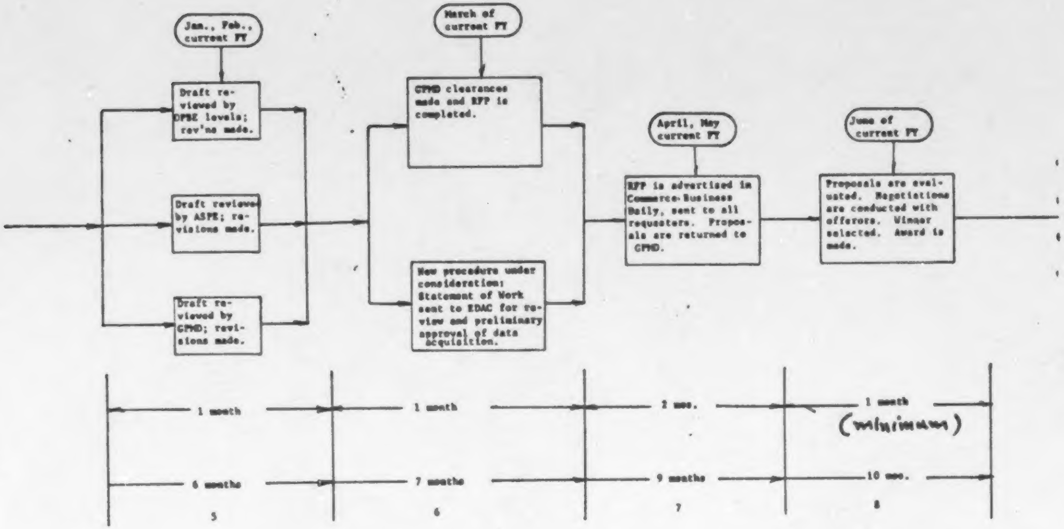
[Information submitted follows:]

CRITICAL PATH OF THE PROGRAM EVALUATION SYSTEM, USOE/OPBE
May 1977

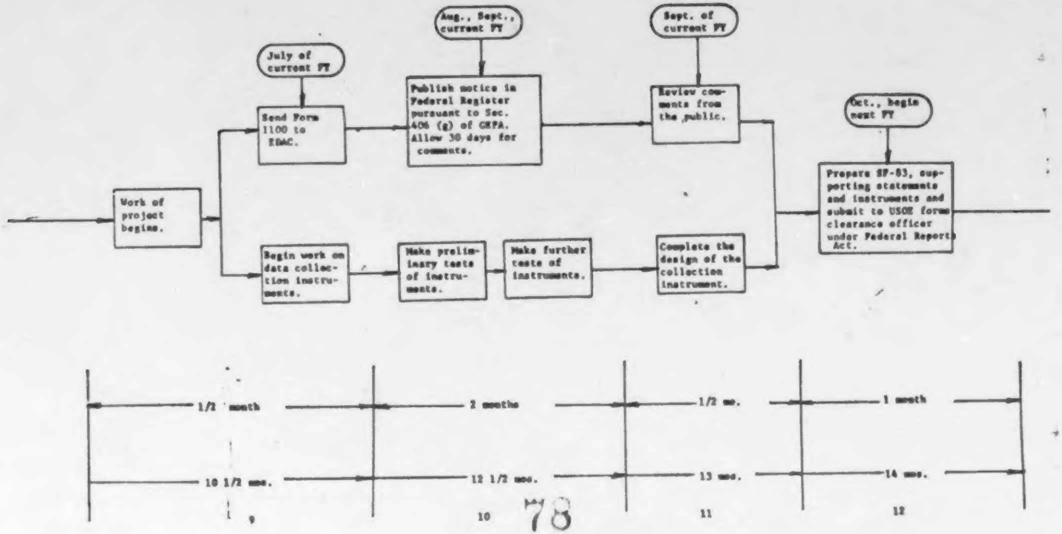
LEGEND:

ASE	Assistant Secretary for Education, DHEW
ASPE	Assistant Secretary for Planning and Evaluation, DHEW
CCSSO	Council of Chief State School Officers
CEIS	Committee on Evaluation and Information Systems of the CCSSO
DHEW	Department of Health, Education, and Welfare
EDAC	Education Data Acquisition Council, implementing organization for the Administrator, NCES, for Section 406 (g) of the GEPA
GEPA	General Education Provisions Act
GPMD	Grants and Procurement Management Division, USOE
NCES	National Center for Education Statistics, DHEW
NIE	National Institute of Education, DHEW
OMB	Office of Management and Budget
OPBE	Office of Planning, Budgeting and Evaluation, USOE
RFP	Request for Proposal
SF-83	Standard Form No. 83, application for forms clearance to OMB
USOE	U. S. Office of Education
FY	Fiscal Year

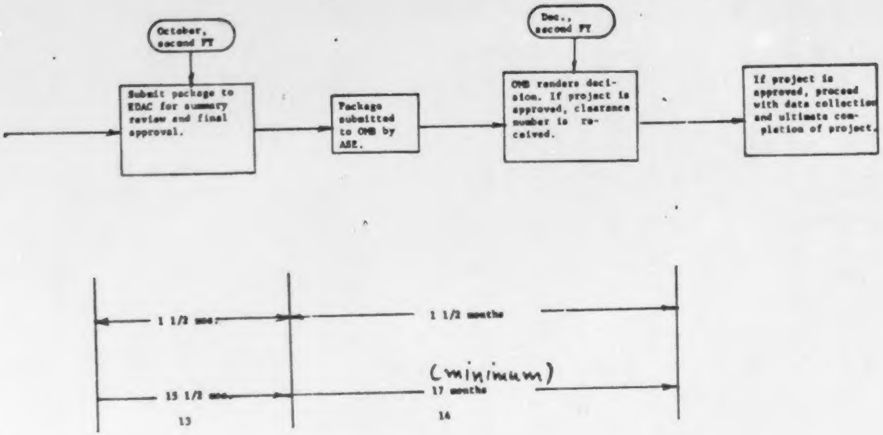

August of prior FY
OPBE completes first listing of proposed studies and priorities. OPBE project monitors tentatively named.
September of prior FY
Review completed by Deputy Comm., Planning
OPBE monitors begin work on projects.
Oct., Nov. new FY
Plan reviewed in depth by ASPE.
Plan is reviewed by ASE, NIE.
Plan is reviewed by CEIS.
Plan is reviewed by all USOE levels.
Plan is reviewed by NCES, EDAC.
December of current FY
Project Officer completes first draft of Statement of Work (highly variable).
Block time
1/2 mo.
1/2 mo.
2 months
2 months
Elapsed time
1/2 mo.
1 month
3 months
5 months
Step Number
1
2
3
4


Jan., Feb., current FY
Draft reviewed by OPBE levels; rev'ns made.
Draft reviewed by ASPE; revisions made.
Draft reviewed by GPMD; revisions made.
March of current FY
GPMD clearances made and RFP is completed.
New procedure under consideration: Statement of Work sent to EDAC for review and preliminary approval of data acquisition.
April, May current FY
RFP is advertised in Commerce Business Daily, sent to all requesters. Proposals are returned to GPMD.
June of current FY
Proposals are evaluated. Negotiations are conducted with offerors. Winner selected. Award is made.
1 month
1 month
2 mos.
1 month
(minimum)
6 months
7 months
9 months
10 mos.
5
6
7
8

CRITICAL PATH OF THE PROGRAM EVALUATION SYSTEM, USOE/OPBE


Work of project begins.
July of current FY
Send Form 1100 to EDAC.
Aug., Sept., current FY
Publish notice in Federal Register pursuant to Sec. 406 (g) of GEPA. Allow 30 days for comments.
Sept. of current FY
Review comments from the public.
Begin work on data collection instruments.
Make preliminary tests of instruments.
Make further tests of instruments.
Complete the design of the collection instrument.
Oct., begin next FY
Prepare SF-83, supporting statements and instruments and submit to USOE forms clearance officer under Federal Reports Act.
1/2 month
2 months
1/2 mo.
1 month
10 1/2 mos.
12 1/2 mos.
13 mos.
14 mos.
9
10
11
12

CRITICAL PATH OF THE PROGRAM EVALUATION SYSTEM, USOE/OPBE


October, second FY
Submit package to EDAC for summary review and final approval.
Package submitted to OMB by ASE.
Dec., second FY
OMB renders decision. If project is approved, clearance number is received.
If project is approved, proceed with data collection and ultimate completion of project.
1 1/2 mos.
1 1/2 months
(minimum)
15 1/2 mos.
17 months
13
14

Mr. **Jennings**. The last question has to do with an Office of Education, May 1976 conference on achievement testing for program evaluation. It seems that many experts at that conference recommended limiting or ceasing large scale Federal education evaluations such as those contracted by the office that Dr. Evans administers, and placing greater emphasis upon local evaluations.

Could you tell us what you think the value of conducting large scale evaluations is, and why is there so much criticism of such evaluations? Why was so much criticism raised at that conference? What are some of the problems inherent in bias and data collection methods and analyses, and what is your general reaction to those criticisms, and have you modified your conduct of your evaluations since that conference?

Dr. **Evans**. Yes, Mr. Jennings. On that issue I do not concur completely with the conclusions or recommendations of that conference. I, myself, do not think that we should abandon national evaluations, or general use of standardized tests.

I think in the discussions that have gone forward between my office and the members and staff of this committee, particularly in the area of Title I, that what we seem to be moving toward now is something that I concur with fully and support, and which we are implementing with expedition and considerable effort, is a joint kind of evaluation process which, through the requirements that were contained in Section 151, call for, across a broad front of activities and efforts, the upgrading, improvement, and expansion of local evaluation activities at all sites.

We have developed, at the committee's insistence, a series of evaluation models—which I can report on in greater detail at some other time, but I think the general conclusion is that we have had substantial positive reaction to those models, more so than I personally expected, with the result that a large number of school districts are implementing them and modifying their own local Title I evaluation activities in a way that ought to improve greatly both their validity and their comparability, both of which have been very sadly lacking up until recent times. All of this, hopefully should provide data at individual local sites on local Title I effectiveness, and should stimulate a concern with program effectiveness from the standpoint of rigor, objectivity, and competence at the local level.

At the same time, we hope it will also allow the compilation of those individual reports and data into a national report. But even though all of that is going as well as I think it is fair to say it is, coming back to the point that the chairman raised earlier about data burden, the national evaluations rest upon samples, and they can speak most efficiently and in my judgment most competently and most quickly to national questions of effectiveness of programs like Title I.

My judgment is that national evaluations of the kind represented by the type that we have supplied the committee with over the past weeks on the programs it is now reviewing are a vitally important part of a total evaluation program aimed at providing useful information to decisionmakers in both the executive and congressional branches.

In the case of the tests, it is true that analysis and use on disadvantaged populations and multilingual populations over the past years have uncovered problems in the applicability of these tests, but in my judgment those problems should not lead us to conclude that standardized tests are invalid and should be abandoned.

In the case of our own work in the emergency school aid evaluation, we were sufficiently conscious of these problems to develop special forms of the tests that were without cultural bias, and we will continue to try to improve these tests.

But by way of a summary answer to your question, my feeling is that we should go forward, as we are now, encouraging, expanding and supporting through models, publications and technical assistance centers and the like, local evaluation activities, but that both the administration and the Congress will be well served by continuing to demand and support and to carry out high quality national evaluations. We will continue to have imperfections in those, but there will be probably even more in local evaluations, one of which imperfections is in the area of testing. We are simply going to have to do what we can to improve them, but I do not think we can abandon tests of achievement on the learning activities of the children our programs are designed to assist.

Mr. JENNINGS. Thank you.

Mr. Cross.

Mr. CROSS. I would like to return to a couple of themes which have been touched on before, and then move on to some other things.

I received, I think it was on the 25th of May, this report done by one of the policy centers, on the long-term sustaining effects of Title I. The report is dated March of 1977 and I received it on May 25th.

In the intervening weeks between the time of the date and the time I received it, I heard about it from a number of sources, attended one conference in New York in which it was a subject of major discussion, and found that I finally got a copy of it officially 6 weeks after it had been discussed at a public meeting in New York, New York. This returns to the theme Mr. Jennings and Mr. Heftel were talking about on timing. But I find it very difficult to accept why that much delay in a document, whose cover date is anywhere between 8 and 11 weeks beforehand.

This is not the only time. I have the third year emergency school evaluation also dated March, which I received in May. It is not so much a question I suppose as a request that something be done to expedite the clearance of those reports because once they are printed, even though you may not have released them and done the executive summaries of them, they become very much public knowledge. We are hampered, never having seen the document itself, while people are coming to us and talking about it. I think that that is a concern of a number of people.

Dr. Evans, I wonder if you could, for the record, supply a summary of what is being done to implement Section 151 of ESEA, which you touched on just a moment, that has been the subject of some controversy, and if you could, provide a description of what is going on under that set aside, the location of those centers.

I think there are 10 of them around the country, is that right?

And also Title I, of course, is going to grow in appropriation quite a bit in the next couple of years because of the forward funded increases already agreed to, what are your plans for expansion in the use of that one half of 1 percent set aside?

Dr. EVANS. We have such material and will be happy to supply it in timely form for the record.

[See letter from Dr. Evans to Mr. Quie at the end of this day's proceedings.]

Mr. CROSS. Thank you.

In a recent System Development Corporation summary or evaluation of emergency school aid, among the results that it contains is that the third year of emergency school aid is shown to have some positive effects.

Can you tell me what the statistical correlation was of that result, and whether you would view that as being a weak, a moderate, or a strongly correlated finding?

Dr. EVANS. Let me ask Mr. Wisler to respond to that question.

Mr. WISLER. The finding was statistically significant.

Mr. CROSS. At what level?

Mr. WISLER. I imagine at the .05, but I would have to check that.

Mr. CROSS. If you could, I would appreciate it, because I think in my reading of it, it appears to be a very weak correlation, and something that has given both myself and some others some concern, as to the fact that the result may be overstated in terms of the statistical finding itself.

You have just released in a report on Follow-Through. There has also been some criticism of that report. I wonder if you could also address the statistical validity of the correlations there, how strong those were, whether or not they were moderate, weak or strong findings on your part, and also the more general issue of what do you consider to be a correlation strong enough to pass as a measurable achievement which you would then state in a report shows program results?

Dr. EVANS. With respect to the Follow-Through findings, again as I think you and other members of the committee and committee staff know, that evaluation has had a long and labored history, and came under the supervision of my office only after it was well underway and long on the way to completion. Retrospectively we can certainly see many ways in which that activity might be done better if it were done over today, and I, myself, have been a critic of some of its procedures since the outset.

Nevertheless, we have examined that evaluation at several junctures during recent years to decide what should be done about it and have concluded that despite imperfections the information it would yield and now has yielded would be useful for decisionmaking purposes, and that remains my view.

Specifically with respect to your question, it seems to me that the findings there, most of which show a failure of most of the models, as models, to demonstrate substantial improvements in achievement of the Follow-Through youngsters, are findings that are hard to put aside. The data are massive, based on large numbers of children across numerous sites, using different outcome instruments, and compared against different control or comparison groups.

The findings in the few places where positive effects are present seem strong enough to support that judgment and to have confidence that there is something educationally important and worthwhile going on.

With respect to your technical question, we usually employ two criteria for deciding whether a difference or a finding is important and significant. The first one is the statistical criterion of the confidence level. In statistics it is customary to regard differences or correlation coefficients as significantly different from zero, or statistically reliable, if they reach what is called the .05 level of confidence. That is an arbitrary level which has a long history of acceptance and use in quantitative analysis. But basically what it says is that, if the size of a difference between two groups is large enough to occur by chance only 5 times in 100, it is one we would accept as a nonchance finding.

We use that commonly accepted criterion for statistical significance. However, in many cases one can find a difference or a correlation that is statistically reliable at the .05 or greater significance level, and yet its size is so small that one is hard-pressed to imagine that it means anything in terms of improving children's peformance in school. So we add another criterion, what we call one third of a standard deviation, which is a magnitude measure, and says that quite apart from statistical reliability, we will restrict ourselves to differences in size of that order because they seem to be, again by a fairly arbitrary judgment, large enough that one is intuitively inclined to say that if a difference that large occurs, it probably has some palpable and observable effect in the child's behavior and in his classroom perforamance.

Mr Cross. Correct me in the record if I am wrong on this, and I regret that I can't cite you the page because I went through this sometime ago and I went through this last night and couldn't find it, but one of the remarks here, one of the conclusions with respect to the third year effectiveness, the statistical correlation that is cited is then, in my reading of the document, thrown away several sentences later when it says, essentially in a parenthetical or footnote, that this is not a statistically significant correlation. I would appreciate it if someone could address that specifically in response to the hearing record.

Dr. Evans. I am sorry, I guess we are not able to address that here and we will have to supply that for the record.

[Information requested follows:]

ESAA Evaluation Findings

The assertion of program impact in the ESAA Basic Program was a summation statement incorporating data from several sorces (*The Third Year of Emergency School Aid Act* [*ESAA*] *Implementation.* System Development Corporation, TM-5236/014/00, March 1977, Pp VIII. 13,14). Primarily, it summarizes the results of comparing the reading and mathematics achievement gains made by ESAA participating students with those made by similar but non-participating students. The methodological design employed was a very powerful one for assessing such effects. Six comparisons were made representing the combination of the two achievement outcomes tested at three different grade levels. In the absence of a program effect, no difference in gains would be expected. The results indicated larger gains for ESAA participants than for non-participants in 5 of the 6 comparisons. Statistical tests of the magnitude of these programs effects further indicated that 2 of the 5 (fourth grade mathematics and fifth grade reading) reached the .05 level of statistical significance. This level, although commonly acepted for laboratory experiments, is quite conservative for educational field experiments. In fact lowering the significance level by only 1 point, to the .06 level, would have yielded statistically significant results for the fourth grade reading outcome so well. All three of these differences were of sufficient size to be meaningful from the educational consequences point of view. The overall number, pattern, size, and statistical significance of the differential gains favoring ESAA participants provides substantial and convincing support for the claim of program impact.

Mr. CROSS. Yes. I think perhaps the contractor probably can cite that and find it for you.

Dr. EVANS. I would just say that, as a matter of principle, I would concur with what I believe is your concern and skepticism. One of the things that I personally have tried to make a matter of policy in our own office, in our reports, and in our summaries is not to follow the procedure that is regrettably not uncommon in the reporting of statistical data, which is to talk about a difference which appears to be a difference of some notable size, but in fact is not statistically significant. It seems to me that our policies should regard that as a nondifference, which we generally do.

Mr. CROSS. Yes, that is exactly my concern. I appreciate your explanation of the standards which you follow. One of the criticisms which is often expressed—and this I must say often comes from supporters of a program who find that OE has said something in their evaluation that is contrary—is that somehow you have shaded the contractor's findings, and the follow-through program is perhaps the most recent and individual example of that. Bilingual education is also another one.

I wonder if you could supply for us an indication of what you do in terms of reviewing a contractor's findings, in terms of judgment back to that contractor, in terms of what changes should be made, and, if you could, take a report like follow-through, and give us copies of perhaps the recommendation pages of the various drafts along the way so that we could see whether or not there had been that kind of alteration along the way.

Dr. EVANS. We will certainly try to do that and search our records for what we have there. I would just declare quite forcibly, as a matter of principle and procedure, that while we exercise very close monitoring, control, supervision, and quality review over all of the activities in our evaluations from fieldwork, instrument construction, to data analysis and report writing, and do not accept full completion of a contractor report until we are satisfied with it, that that detailed review does not involve censorship or demands to alter findings.

We very often will require a contractor to run additional analyses at the end to explicate some finding or some alternative explanation of it, but the contractor writes his own report. It becomes a matter of public property as soon as it is completed, and then we write our own summaries of it, which are an attempt to make the findings clear and more succinct, but not to alter them.

The possibility of comparison is always there. I think that if someone were to conduct a survey or an audit or an interview with our principal contractors, I would frankly be astonished if any of them said that we had in any way restrained their freedom in reporting the findings or in making recommendations.

Mr. **Cross**. I think this most often comes from people on the outside—

Dr. **Evans**. Yes.

Mr. **Cross**. —who are subject to being affected by the results of an evaluation.

One of the concerns which has been expressed is which programs are evaluated and which ones are not. You indicated you had about $21 million or $18 million—I have forgotten the figure now—in the most recent year.

Dr. **Evans**. Seventeen.

Mr. **Cross**. How do you go about deciding which programs are evaluated? How do you parcel out your evaluation funds?

For instance, I noticed in your summary of what you have done, and Mr. O'Keefe's, that both of them spoke to basic grants, and some analyses of that. I couldn't quite honestly make an intellectual decision as to why one of those was the Secretary's evaluation and one of those was the commissioner's. There may be some logic to it, but it really escapes, looking at your two statements side by side, because they both seem to be addressed to general policy issues, in terms of the renewal and in terms of making some decisions on program resource allocations.

Dr. **Evans**. The observation you made is correct. There are instances where the three offices do in fact do very similar things because there are similar interests, either at the policy level or the program effectiveness level in those activities, as has been stated by both Dr. Relic and Mr. O'Keefe.

We do make a strong effort to coordinate the activities so that we won't be stepping over each other or engaging in redundant or conflicting activities.

With respect to your basic question of how we decide to go about expending each year the $17 milion that comes to us through both the 416 general authority and the specific programmatic set asides, we have a fairly elaborate procedure for developing an Annual Evaluation Plan, which is a document that is available. We would be happy to supply you with a copy if you would like one.

Basically what that consists of—and we are going through it right now for the coming year—is applying several criteria.

The first, of course, is mandated studies. We take those first, and in the cases where they are paid for by set asides, that is no problem. That is not always the case. There are some cases where the Congress has mandated studies but not set aside funds so we have to take money out of the GEPA 416 general authority. Those have the first call on our funds. We set those aside, we estimate their costs, and we put somebody on designing them.

The second demand is studies that are already underway, continuations. Presumably our decisions in past years have been based upon reasonable considerations, so we set aside the necessary funds for continuation of multiyear studies that are already underway. Of course, we cannot use the Title I set aside to do studies on vocational education, and so those go forward.

Finally, we end up with a small amount of free, unemcumbered money, usually out of the GEPA 416 authority that is available for new starts. We analyze what we have done on various programs in the past, what information we have in hand about them, what the upcoming legislative renewal dates are, and we then array a series of alternative candidates for evaluation studies for those limited funds.

That process involves extensive discussion with the program staffs, in vocational education, Title I, adult education, special projects or whatever, and I hold a series of meetings with the directors of those programs. We have their inputs, and out of that we array a ranking of studies which we want to conduct. The list always exceeds the funds we have, so we have to make trade-offs. The plan also gets circulated and reviewed by the other two offices represented here, is finally signed off by the Commissioner, and then becomes an action document for my office to proceed with.

Mr. CROSS. Thank you. That is very helpful.

My memory does not serve me on this.

Have you done a review or an evaluation of the Title I handicapped program in the last few years?

Dr. EVANS. Let me ask Dr. Maroney to report on our activities there.

Dr. MARONEY. We started a study and due to contractor performance were not able to complete it. So we do not now have an ongoing study.

Mr. CROSS. So there has never been a study of that set aside?

Mr. MARONEY. No, there has not.

Mr. CROSS. I noticed that one of the things you have down for March is an interim report on the neglected deliquent under report Title I, that program costs which is about $28 million or $29 million annually. The handicapped set aside is something like $121 million annually and no evaluation or that program is planned. That raises a question of priorities.

Dr. EVANS. That is a well taken point. The study that Dr. Maroney referred to is one that was born out of our analysis precisely the same as yours, that something should be done. Unfortunately, out of all the contracts we let and the studies that we design and initiate, all do not get successfully carried out or even launched. As I said, the close monitoring that we do on these studies sometimes reveals severe problems in the conduct of the study. We make every effort that we can to correct those problems, but there come times when we have to cancel out a contract. This was one of those times, regrettably, but we will be going back to that effort.

Mr. CROSS. It is good to know that sometimes contracts are canceled. Yesterday Dr. Ellis, in his testimony of the set aside under the Special Projects Act, talked about dissemination, and said, I believe, if I remember correctly, that the joint dissemination review panel has approved 170 projects and 700 of them have been disseminated. I know Mr. Quie has some concerns about what is the limit.

How many projects can the system take? How many can you effectively disseminate? And more importantly, what standards besides the gain, the academic gain, that you use to judge whether programs can be replicated or not?

We have seen out of the Rand study on renovation, the Ford Study on the lighthouse school districts, and a number of other things that more often than not, the personnel, the leadership involved in a program, is more responsible for its success than the components which are more measurable. And I mention those concerns and ask you to talk a little about the dissemination review process.

What do you see as the ultimate number of programs disseminated? How do you assure that there are more than just year-to-year gains that you are disseminating? And do you evaluate or do you plan to evaluate how effectively those programs have been implemented in the field?

Dr. **Evans**. Those are trenchant questions and we have tried to attend to them.

I might say quickly, by way of historical perspective, that this dissemination review process that you speak of is a joint one between ourselves and NIE. It was initiated in the Office of Education, but as the NIE came into this area and became a forceful and active agency, we were concerned that there not be the embarrassing incident of our having decided to disseminate or not to disseminate something, and NIE making an opposite judgment about its disseminability. So we initiated this coordinated Dissemination Review Panel.

The original mechanism got underway originally in 1972 under then-Commissioner Marland, who noted that the process of dissemination in the Office of Education was essentially an ad hoc, autonomous, and uncoordinated one in which whatever program offices or staffs felt ought to be disseminated was in fact put out under an implied or stated imprimatur of recommendation by the Office of Education and the Federal Government that here was something useful and people ought to adopt it, spend their money on it, and expect good things from it. But when one asked what lay behind that recommendation, how did we know that those things were good enough to deserve that recommendation, the answer was usually not very reassuring. It often consisted of little more than the fact that people had visited project sites and liked what they saw, or that teachers and children seemed to be happy with it. But in terms of evidence of effectiveness, usually very little was there.

The decision was then made that the Office of Education would disseminate only materials that had evidence of effectiveness behind them. And so the Dissemination Review Panel was instituted. Since then it has examined over 300 submissions from different program offices, principally Title I and Title III, and has approved about 55 percent of the submissions.

Those have gone into the National Diffusion Network, which has been very active in disseminating them, and there has been, I think it is fair to say, a fairly positive response to that activity and its output.

With respect to the number, I guess my impression would be rather different from Mr. Quie's. I think the last thing we have to worry about right now is a superfluity of effective materials and methods. What we do in effect, from the standpoint of the Federal Government, is to approve these things and put them out there in one form or another so that local educational agencies have the opportunity to choose.

We think it would be inappropriate for the Federal Government to be more forceful than that. Most of those approved 170 projects, by virtue of all the funding that has gone to Title I and Title III, tend to relate to or deal with basic skills and compensatory education. We have very few exemplary programs in that repository that deal with vocational education, handicapped education, and other areas.

In my judgment, there is a very great need for expansion of that storehouse into a larger one that covers a broader area of programmatic subjects and target populations.

With respect to your mention of going beyond assessment of the evidence of effectiveness to the other considerations that relate to replication and implementation, that is an important problem, and I would simply have to say that the Dissemination Review Panel has purposely ruled that area off limits for itself. It has restricted its judgment to evidence of effectiveness and left the other areas to programmatic judgment and concern.

My office has done some things, however, which do relate to that. It has taken some of the projects that were approved by the Dissemination Review Panel, and has noted what was in youir mind, that once having approved a project, all that is available for a local school district is a fairly technical report on its effectiveness, and a table filed with squares and significant difference findings. This kind of material is not enough to help a teacher know what to do on Monday morning.

We identified what we called "the packaging gap," and then proceeded to develop the program I think you are familiar with which is part of the Special Projects activity We have taken those approved projects and have hired a contractor to go back to the originating site and to bring together all of the elements that are in that effective project, the planning materials, curricular materials, teacher training, the costs, and so on. We have developed what we believe to be helpful implementing packages and have in turn asessed them.

We have reintroduced those back into the field via some grants from the old Title III, and have studied the process of adoption and replication, and the results of that study will be coming available soon.

They indicate that faithful replication does occur, that the school districts like these materials, that they can use them, and there seems to be some utility in that activity. But I think you are quite right, that there is a much larger area of concern, that even with packages and even with clear descriptions and even with the backing of evidence of effectiveness, the successful implementation of new ways of educating children will depend enormously on local conditions and concerns, as the Rand report demonstrated, and I would simply have to say we don't have any solution to that array of problems at this time.

Mr. Cross. Let me commend you for remembering all the parts of all the questions we have been throwing at you. Your ability is remarkable.

My concern gets back to the fact that you have had 170 approved. You have had money to turn 70 of them into program information packages I think or PIPs if that is correct.

Is that right?

Dr. **Evans**. Let me ask Mr. Wickline, who is here, and who is responsible for the work on a national diffusion network, He can give a more elaborate and more helpful answer to that question than I can.

Mr. **Wickline**. The dissemination panel has approved 170 projects. It has examined these and found that they do have objective evidence to show that they are effective. As of this year, we will have 80 developer or demonstrator projects in the National Diffusion Network, which means that what we have done is made moneys available to the original developers of these programs so that they may provide programs of technical assistance to school systems across the nation which want to install these programs.

As far as the project Information Packages are concerned, I think maybe it would be better to defer to Dr. Bezdek.

Dr. **Evans**. Dr. Bezdek works in my office and has been principally responsible for the major evaluation work that I alluded to of what we call the PIPs or the Project Information Packages.

Dr. **Bezdek**. Of the number, which was about 160 that went through the Joint Dissemination Review Panel, 80 of those went, as Lee told you, into the network for national dissemination. Sixteen of the 160 that passed the Joint Dissemination Review Panel have been packaged in the form that Dr. Evans just told you about. Of those 16, we have disseminated on a large scale 6 of those that have undergone field testing and revision, and of those 6, we have approximately 31 States involved and 135 adoptions.

Of the other 10 that we have prepared, 4 of those are bilingual projects, and they are undergoing field testing with support from Title VII, and 6 of those are currently going to be diffused through the National Diffusion Network beginning in the next school year.

Mr. **Cross**. I wonder if for the record you could supply a list of those 16 that have been developed as PIPs.

Dr. **Bezdek**. I can.

[Information requested follows:]

DEVELOPMENT COSTS FOR SIXTEEN PROJECT INFORMATION PACKAGES

I. Initial Development Costs		
First Series: 6 Projects (1974)	(A)	$300,000*
per project	(B)	50,000
Second Series: 10 Projects (1976)	(C)	360,000
per project	(D)	36,000
TOTAL INITIAL DEVELOPMENT COST		
16 projects	(E)	$660,000
per project	(F)	$41,250
II. Field Evaluation Costs		
First Series: 6 Projects, 19 sites, 54 schools, 4,000 students, 2 year study, student testing	(G)	1,700,000
per project	(H)	283,333
III. Revision Costs		
First Series: 6 Projects	(I)	245,000
per project	(J)	40,833
IV. Development, Evaluation and Revision Costs		
First Series: 6 Projects	(K)	2,245,000
per project (B + H + J)		374,166
COST PER COPY CURRENTLY		$35-$50

*Includes the search, identification, and validation of 6 models prior to the development of the packaged materials.

PIP PROJECT ADOPTIONS

OVERVIEW

	Project	No. of States	No. of LEAs
1.	Catch-up	16	42
2.	Programmed Tutorial Reading	18	32
3.	Conquest	7	11
4.	High Intensity Tutoring	12	24
5.	R-3	5	5
6.	Intensive Reading Instructional Teams	3	3
*7.	Nuevos Horizontes	2	6
*8.	Adelante	4	4
*9.	Venceremos	3	4
*10.	Savoir	2	4
**11.	Catch-Up-Keep-Up		
**12.	Discovery Through Reading		
**13.	Improvement of Basic Reading skills		
**14.	Reading Improvement Project		
**15.	Remedial and Corrective Reading		
**16.	Seaport		
	TOTAL	31	135

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*Undergoing field try-out with ESEA Title VII grant support.

**Dissemination will begin shortly via the NDN.

PIP PROJECT ADOPTERS

STATE AND SCHOOL DISTRICT	PROJECT	TO BEGIN SY 1977-78
Alabama		
1. Sumpter	Catch-up	
California		
1. Downey	Neuvos Horizontes	X
2. Long Beach	" "	X
3. Rowland	" "	X
4. Imperial Beach	" "	X
Connecticut		
1. Hartford	Adelante	X
2. Woodstock	Programed Tutorial Reading	X
Idaho		
1. Firth	Catch-up	X
2. Wallace	Programed Tutorial Reading	X
Illinois		
1. Bellville	Catch-up	
2. Dingola	"	
3. East St. Louis (Parochial)	"	
4. Al Wood	"	
5. Quincy (Parochial)	"	
6. Wolf Lake	"	
7. Knoxville	"	
8. Franklin	"	
9. Rockford	"	
10. Toluca	"	
11. Flora	"	
12. Benton	"	
13. Liberty	"	
14. Wayne City	"	
15. Minier	Programed Tutorial Reading	X
16. Joliet	Conquest	
17. Braidwood	High Intensity Tutoring	
18. Round Lake	R-3	
19. Rockford	Adelante	X

STATE AND SCHOOL DISTRICT	PROJECT	TO BEGIN SY 1977-78
Indiana		
1. Bloomington	Catch-up	
2. Bloomington	Intensive Reading Inst. Teams	
3. New Albany	Programed Tutorial Reading	X
Kansas		
1. Wichita	R-3	X
Kentucky		
1. Springfield	High Intensity Tutoring	X
2. Winchester	" " "	X
3. Louisville	" " "	X
4. Louisville (Parochial)	Programed Tutorial Reading	X
5. Springfield	" " "	X
6. Winchester	" " "	X
Louisiana		
1. Luling	Savoir	X
2. Marksville	"	X
3. Ville Platte	"	X
4. Lake Charles	Programed Tutorial Reading	X
5. New Orleans	R-3	X
Massachusetts		
1. Ware	Catch-up	X
2. Stoneham	High Intensity Tutoring	X
3. Stoneham	Intensive Reading Inst. Teams	X
Michigan		
1. Benton Harbor	Conquest	
Minnesota		
1. Montgomery	Catch-up	X
Mississippi		
1. Lexington	High Intensity Tutoring	
2. Canton	Programed Tutorial Reading	

STATE AND SCHOOL DISTRICT	PROJECT	TO BEGIN, SY 1977 78
Missouri		
1. House Springs	High Intensity Tutoring	X
Montana		
1. Whitehall	Catch-up	X
New Hampshire		
1. Kingston	High Intensity Tutoring	X
New Jersey		
1. Hampton	Catch-up	
2. Newton	"	
3. LaFayette	"	
4. Dover	"	
5. Newton	Conquest	
6. Newton	Programed Tutorial Reading	
7. LaFayette	High Intensity Tutoring	
New York		
1. North Belmore	Catch-up	
2. Elma	"	
3. Batavia	"	
4. New York City #152	"	
5. Brookhaven	"	
6. Lakeland	"	
7. Levitown	Conquest	
8. Shawnee	"	
9. New York City #152	"	
10. Middle County, Long Island	"	
11. Longbeach, Long Island	"	
12. Middle County, L.I	Programed Tutorial Reading	
13. North Belmore	" " "	
14. Fillmore, Long Island	" " "	
15. Mt. Sinai Union	" " "	
16. Riverhead	" " "	
17. Moriches	High Intensity Tutoring	
18. Suffolk County Jail	" " "	
19. Tarrytown	" " "	
20. New York City (St. Jean Battiste)	" " "	
21. Olean	" " "	
22. Freeport, Long Island	R-3	

STATE AND SCHOOL DISTRICT	PROJECT	TO BEGIN SY 1977-78
North Carolina		
1. Maxton	Programed Tutorial Reading	
2. Wilson City	" " "	
3. Jacksonville	High Intensity Tutoring	
4. Maneto	" " "	
5. Columbus	" " "	
6. East Spensor	" " "	
7. Columbus	Catch-up	
8. Jacksonville	"	
Oklahoma		
1. Oklahoma City	Intensive Reading Inst. Teams	
2. Carney	Programed Tutorial Reading	X
Oregon		
1. Culver	Catch-up	
2. Detroit	"	X
3. Santium	"	X
4. Reedville	Conquest	
5. Tigard	High Intensity Tutoring	
6. Pilot Rock	" " "	X
7. Oregon City	Programed Tutorial Reading	X
8. Aumsville	" " "	X
9. Portland	" " "	X
10. Dayton	Venceremos	X
Pennsylvania		
1. Langhorn	Catch-up	
2. Norristown	Conquest	X
3. Cheltenham	Programed Tutorial Reading	
Puerto Ricao		
1. Hato Rey	Adelante	X
South Carolina		
1. Conway	Program Tutorial Reading	X
2. Bishopville	" " "	X
3. Fleming	" " "	X
4. St. George	" " "	X
5. Florence	Catch-up	X

STATE AND SCHOOL DISTRICT	PROJECT	TO BEGIN SY 1977-78
6. Estill	High Intensity Tutoring	X
7. Hampton	" " "	X
8. Timmonsville	" " "	X
Tennessee		
1. Oak Ridge	Programed Tutorial Reading	X
Texas		
1. New Braunfels	Nuevos Horizontes	X
2. Morton	" "	
3. Bishop	Venceremos	X
4. San Antonio	"	X
5. Houston	Adelante	X
6. Dallas	Programed Tutorial Reading	
7. Poth	" " "	X
8. Italy	" " "	X
9. Avalon	Conquest	X
10. Orange Grove	High Intensity Tutoring	X
Utah		
1. Blanding	Catch-up	X
Vermont		
1. Richford	Savoir	X
Virginia		
1. Galax	Catch-up	
2. Providence Forge	"	X
3. Vienna	R-3	
Washington		
1. Pasco	Vencerenmos	X
2. Ferndale	Catch-up	
3. Sutherlin	"	X
4. Ferndale	Programed Tutorial Reading	X
West Virginia		
1. Elkins	Programed Tutorial Reading	X

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**Dissemination will begin shortly via the NDN.

Mr. Cross. And also the amount of money that is required to develop them individually, and how much it costs you to put something—well, let me put it differently. You said you give money to the originating school districts so that they can do training. If you could give us a range of how much you are providing to those districts and how much it is costing, I think that would be helpful.

Dr. Evans. We will be happy to do that.

Mr. Cross. I must say that Dr. Relic's earlier comments about being faced as a school superintendent with all of these forms coming across his desk in one day to fill out, I can imagine that being added to by him saying to somebody it would be great to have a new program on basic skills, and somebody descending on him with 16 PIPs, and having that array of data, I think it gets back to the need for the individualized approach. I think that NDN does do some of that, but I think that you do bear the risk of overcrowding the field in terms of information without being sure that it is really usable and applicable to the people at the local level who need it, because they in many cases don't have the sophistication to be able to sort out the chi square.

Dr. Evans. I wouldn't say that. I think there is a very important difference that is being recognized by the people at the local level between requests for data of the kind we discussed earlier in terms of research and evaluation and so on, and the kinds of materials and information that come to them through the Dissemination Network and the Project Information Packages.

We have developed a system which allows the school districts to look at what these projects offer, and it just seems to me that the attitude at the local level is quite different. They really are often hard-pressed to see the immediate utility to them of information that we are asking them to supply on, let's say, national evaluations; and so they are understandably resistant to do that.

On the other hand, they are keenly interested in information relating to program activities which can change their system, which can improve their Title I activities, which can improve their local activities. I think it is fair to say that there has been a general positive reception of the kind of materials that have been proffered individually and through the NDN and elsewhere on these programs that have evidence of effectiveness behind them, and have associated instructional implementing materials with them.

Mr. Cross. Your point is well taken. I think you know that we have been very supportive and very pleased with the efforts to get dissemination more into the focus of both NIE and things like the national diffusion network. Don't let me leave the wrong impression. I am just concerned that there be, if you will forgive the term which I hate to use, the linkages between what you develop and the implementation in the field.

Finally, could I ask that you just submit for the record an explanation, which I think has already been prepared, at some time—I think it should be in this hearing record—of the difference between the national diffusion network and the NIE dissemination efforts, a description of how they are derived and how they are similar and what kind of clients they are serving. Also perhaps elaborate a little more on the answer in terms of how you assure that they are not duplicative in what they are disseminating and who they are disseminating to.

[Additional material for the record follows:]

Oversight Hearings

National Diffusion Network

Response to request made by Criss Cross concerning NDN-NIE relationships.

Almost all programs and practices disseminated through the National Diffusion Network were developed with Office of Education demonstration funds and are for use in elementary and secondary schools. The programs and practices are practitioner developed and the Network makes the practitioners who developed these successful programs and practices available to train teachers and administrators in school districts across the country that want to install one of the programs or practices in the National Diffusion Network.

The National Diffusion Network limits its activities primarily to the installation of 80 programs that have been funded as Developer-Demonstrator Projects, although awareness information is provided to LEAs for an additional 90 programs and practices that have been approved by the joint Dissemination Review Panel.

NIE's dissemination efforts, as I understand them are much broader. It is supporting activities which are designed to build into the educational system the capacity to use systematically developed knowledge and innovative practice to improve the ducational process. The institute develops and maintains an accessible, comprehensive information base for building this capacity and it promotes the use of Research and Development outcomes and successful local practices to solve high-priority problems in education.

There are no major overlaps between the NDN and the NIE dissemination efforts. Staff members from OE and NIE have been working together during the past year in a collaborative effort to eliminate duplications and to make OE and NIE dissemination efforts mutually supportive. This collaboration resulted in the 1977 National Dissemination Forum which recently brought together, for the first time, over 500 persons from the field who work with OE and NIE dissemination activities. We expect this collaboration to continue and to increase at the national level and at State and local levels as well.

Oversight Hearings
National Diffusion Network

The following is in response to a statement made by Cris Cross which went something like this "you said you make funds available to local school districts that developed programs included in the National Diffusion Network. Will you submit for the record the range of how much the NDN is providing to these school districts and how much it is costing?"

Response

First, I think it is important to point out that the developer of a program that is to be included in the National Diffusion Network must agree to continue to operate the demonstration program at no cost to the Network, so that potential adopters of the program may visit the developer site and see the program in operation. Network funds made available to the developer may be used only to: (1) refine materials that have already been developed, (2) develop training programs, (3) train staff members in school districts across the nation that have made committments to install the program, and (4) pay for the costs of materials needed to install the program in other States.

The range of awards for these Developer-Demonstrator Projects is from a low of $15,000 to a high of $110,000. The average funding level for first year Developer-Demonstrators is about $32,000 while the average level for second and third year Developer-Demonstrator Projects is about $48,000. The appropriation for the NDN is Fiscal Year 1977 was $7.5 million which supports 80 Developer-Demonstrator Programs and State Facilitator Projects in 48 States. Based upon the Stanford Research Institute's Evaluation of the NDN, the Network is installing "deep rooted" adoptions in about 1,000 school districts each year at this annual funding level.

DEVELOPER DEMONSTRATION PROGRAMS

IN THE NATIONAL DIFFUSION NETWORK

READING LANGUAGE ARTS AND MATHEMATICS

Project PEGASUS-PACE: Continuous
  Progress Reading Program
Tuscaloosa Board of Education
1100 21st Street, East
Tuscaloosa, Alabama 35401
Telephone: AC 205-758-2323 - Home
AC 205-759-5705 - Office

Arizona Consortium for
  Individualized Learning
4643 E. Thomas Road
Phoenix, Arizona 85018
(602) 959-6710

Project STAMM
Jefferson County Schools
1209 Quail
Lakewood, Colorado 80215
(303) 234-7000

Learning to Read by Reading
P.O. Box 497
Jamestown, California 95327
Telephone: AC 209-984-5291 - Ext. 6

CATCH-UP
1601 Sixteenth Street
Newport Beach, California 92553
Telephone: AC 714-556-3300

~~[illegible]~~
Project R-3 Reading, Relevance,
and Reinforcement
1635 Park Avenue
San Jose, California 95126
Telephone: AC 408-287-1111

READING LANGUAGE ARTS AND MATHEMATICS

[redacted], Alphaphonics Reading
Readiness Training Program
Ponderosa School
295 Ponderosa Road
South San Francisco, California 94080
Telephone: AC 415-588-8082

Title I Reading Center
School Board of Broward County, Florida
1320 S.W. 4th Street
Fort Lauderdale, Florida 33312
(305) 581-6410

School Volunteer Program
School Board of Dade County, Florida
1444 Biscayne Boulevard, Room 312
Miami, Florida 33132
(305) 371-2491

Florida Department of Education
Migrant Education Section, Knott Building
Tallahassee, Florida 32304
(305) 735-6110

Reading/English Rotation Project
McDuffie County Board of Education
P.O. Box 952
Thomson, Georgia 30824
(404) 595-3523

Andover's Individualized Reading System (AIRS)
Andover Public Schools
36 Bartlett Street
Andover, Massachusetts 01810
(617) 475-2339

[redacted]
Discovery Through Reading
Clarkston Community Schools
6389 Clarkston Road
Clarkston, Michigan 48016
(313) 625-3330

Vocational Reading Power, MIMC
3554 White Bear Avenue
White Bear Lake, Minnesota 55110
Telephone: AC 612-770-3943

Vocational Reading Power
166 Peik Hall
University of Minnesota
Minneapolis, Minnesota 55455
Telephone: AC 612-376-4580

[redacted], Conceptually Oriented
Mathematics Program (COMP)
1414 I-70 Drive. S.W.
Columbia, Missouri 65201
Telephone: AC 314-449-0881

[redacted], Project INSTRUCT
(Instructional Systems for Teaching Reading
Using Continuous-Progress Technology)
Bellevue Public Schools
2009 Franklin Street
Bellevue, Nebraska 68510
Telephone: AC 402-733-5215

Glassboro Public Schools
Glassboro, New Jersey 08028
Telephone: AC 609-881-6366

Principal, Roosevelt School
Louisa Place
Weehawken, New Jersey 07087
Telephone: AC 201-865-2274

School #4 Annex
Dill Avenue
Linden, New Jersey 07036
Telephone: AC 201-486-3286

Diagnostic-Prescriptive Arithmetic (DPA)
211 Daniel Low Terrace
Staten Island, New York 10301
Telephone: AC 212-447-3637

[redacted]
Project Reading Improvement
Pender County Schools
Burgaw, North Carolina 28425
(919) 259-2188

Alternate Learning Project (ALP)
235 Promenade Street
Providence, Rhode Island 02908
Telephone: AC 401-272-1450

SDR: Systems Director Reading
400 E. Spring Valley Road
P.O. Box 1300
Richardson, Texas 75081
Telephone: AC 214-231-6301

Exemplary Center for Reading Instruction
2888 Highland Drive
Salt Lake City, Utah 84106
(801) 486-5083

Utah System Approach to Individualized
Learning (U-SAIL)
P.O. Box 9327
2971 Evergreen Avenue
Salt Lake City, Utah 84109
(801) 486-5491

[redacted] Project Home Base
Yakima Public Schools
104 N. 4th Avenue
Yakima, Washington 98902
Telephone: AC 509-575-3295

Project HOSTS (Help One Student to Succeed)
Vancouver School District No. 37
5802 MacArthur Boulevard
~~Vancouver, Washington 98661~~
Telephone: AC 206-694-1705
AC 206-693-1775

[redacted] - Added Dimensions
to Parent and Preschool Education
Early Childhood Education
Jefferson County Public Schools
1209 Quail Street
Lakewood, Colorado 80215
Telephone: AC 303-234-7000 - Ext. 346

Early Childhood Preventive Curriculum
Demonstration Center (ECPC)
9240 S. W. 124th Street
Miami, Florida 33176
Telephone: AC 305-238-2250 - Home
AC 305-251-5445 - Office

[redacted], New Adventure in
Learning (NAIL)
W. J. Moore Elementary School
Route 17
Tallahassee, Florida 32303
Telephone: AC 904-877-8595

Early Prevention of School Failure
114 N. Second Street
Peotone, Illinois 60468
Telephone: AC 312-258-3478
AC 312-258-3444

[redacted]
Pre-School Education for Disadvantaged Children
in Title I (PREDICT I)
Cedar Rapids Community Schools
346 2nd Avenue Southwest
Cedar Rapids, Iowa 52404
(319) 398-2111

[redacted], Project HOME START: Family
Centered Preschool Enrichment
Div. of Research, Evaluation and Development
Waterloo Community School District
1516 Washington Street
Waterloo, Iowa 50702
Telephone: AC 319-233-5281

EARLY CHILDHOOD EDUCATION AND PARENT READINESS

Parent Readiness Education Project (PREP)
Redford Union School District #1
18499 Beech Daly Road
Detroit, Michigan 48240
Telephone: AC 313-535-2000 - Ext. 210

Family Oriented Structured Preschool
Activity Personalized - Seton Hall
Preschool
1204 7th Street, South
St. Cloud, Minnesota 56301
Telephone: AC 612-253-5828

[redacted], SATURDAY SCHOOL: Parent-Child
Early Education Program
Ferguson Reorganized School District
655 January Avenue
Ferguson, Missouri 63135
Telephone: AC 314-595-2355 or 2354

Dale Avenue National Dissemination
Network Dissemination Trainer
319 Wash. Street, Mall
Cape May, New Jersey 08204
Telephone: AC 609-884-2097

[redacted]
Director of Art - Perception Plus
Union Township Public Schools
2369 Morris Avenue
Union, New Jersey 07083
Telephone: AC 201-688-1200 - Ext. 257

Training Coordinator
Project COPE
Educational Development Center
110 W. Rosedale Avenue
West Chester, Pennsylvania 19380
Telephone: AC 215-436-2517

Pilot Project Utilizing Supportive
Personnel Using Behavior Modification
Techniques with Articulatory
Disordered Children, Area Edl. Ag. #16
1340 Mt. Pleasant Street
Burlington, Iowa 52601
Telephone: AC 319-754-5771

Re-Ed School
1804 Bluegrass Avenue
Louisville, Kentucky 40215
Telephone: AC 502-366-9385

Project Learning Disabilities
Early Identification and Intervention
731 St. Charles Avenue
New Orleans, Louisiana 70130
Telephone: AC 504-524-8592 - Ext. 351

Dissemination Project FAST
Essexville-Hampton Public Schools
303 Pine Street
Essexville, Michigan 48732
Telephone: AC 517-893-4533

Project SHARE: Sharing High Yield
Accountability with Resource Educators
Route 1
Hendrum, Minnesota 56550
Telephone: AC 218-784-4826

Engineered Classroom for Students who
are both Educably, Mentally Handicapped
and Behaviorally Maladjusted
420 S. Washington Street
Papillion, Nebraska 68046
Telephone: AC 402-399-3411

SPECIAL EDUCATION LEARNING DISABILITIES AND GIFTED

[redacted], Project Success
  for the SLD Child
West Middle School
312 Douglas
Wayne, Nebraska 68787
Telephone: AC 402-375-2230

Co-Directors
EIC N.W.
Halko Drive
Cedar Knolls, New Jersey 07097
Telephone: AC 201-539-0331

Director, Project ACTIVE
(All Children Totally Involved Exercising)
Ocean Township Elementary School
Dow Avenue
Oakhurst, New Jersey 07755
Telephone: AC 201-531-6600 - Ext. 365

Northwest Special Education (NWSE)
Burke Central School
Lignite, North Dakota 58752
Telephone: AC 701-933-2532

The Oklahoma Child Service
  Demonstration Center
Hillside School
Cushing, Oklahoma 74023
(918) 225-3425

SPECIAL EDUCATION LEARNING DISABILITIES AND GIFTED

Early Childhood Developer-Demonstrator Project
University of Washington, College of Education
Seattle, Washington 98195
(206) 543-7583

Strategies in Early Childhood Ed.
Cooperative Educational Service Agency #13
908 West Main Street Waupun, Wisconsin 53903
Waupun, Wisconsin 539-324-4461

CAREER AND VOCATIONAL EDUCATION

Occupational Versatility
Division of Technology
Arizona State University
Tempe, Arizona 85281
Telephone: AC 602-965-7410

Experienced-Based Career Education (EBCE)
Far West Laboratory
1855 Folsom Street
San Francisco, California 94103
(415) 565-3133

ADMINISTRATION, TRAINING AND SPECIAL ORGANIZATIONAL ARRANGEMENTS

Pupil Personnel Services Demonstration Project
School Board of Pinellas County, Florida
1960 E. Druid Road
Clearwater, Florida 33518
(813) 821-5260

[redacted]
Project DEEP
Wichita High School South
701 West 33rd Street South
Wichita, Kansas 67217
(316) 522-2233

Remediation for Children with
Learning Deficits through Precision
Teaching: The Sacajawea Plan
Special Education Center
P.O. Box 2428
Great Falls, Montana 59404
Telephone: AC 406-791-2111 - Ext. 246

APL Project, ExB 202
University of Texas
Austin, Texas 78712
(512) 471-4623

BILINGUAL AND MIGRANT EDUCATION

Training Migrant Para-Professionals in
  Bilingual Mini Head Start
Educational Service District #123
Box 2367
Pasco, Washington 99302
(509) 547-8442

ENVIRONMENTAL EDUCATION

Priority One: Environment
Union Township Board of Education
2369 Morris Avenue
Union, New Jersey 07083
Telephone: AC 201-688-1200 - Ext. 221

ECOS Training Institute
833 Fox Meadow Road
Yorktown Heights, New York 10598
Telephone: AC 914-245-4009 or 6919

Director, Project KARE
Montgomery County Intermediate Unit #23
McGinnis Office Building
Route 73 and Butler Pike
Blue Bell, Pennsylvania 19422
Telephone: AC 215-643-7600

Project I-C-E (Instruction-
  Curriculum - Environment)
1927 Main Street
Green Bay, Wisconsin 54301
Telephone: AC 414-468-7464

OTHERS

Project High School in the
Community and Community
Planning Council for Educational
Alternatives
45 Nash Street
New Haven, Connecticut 06510
Telephone: AC 203-624-1357

[redacted]
Project Director, Every Child A Winner
Box 141
Ocilla, Georgia 31774
Telephone: AC 912-468-7098

Inservice Specialist/Evaluator
PATL: Positive Attitude Toward
Learning, Bethalto Unit #8 Schools
322 E. Central
Bethalto, Illinois 62010
Telephone: AC 618-377-5211

MEDIA NOW
S. W. Iowa Learning Resources Center
401 Reed Street
Red Oak, Iowa 51566
Telephone: AC 712-623-4913

Project Adventure
P.O. Box 157
Hamilton, Massachusetts 01936
Telephone: AC 617-468-1766

[redacted]
Demonstration Evaluation Center (CAM)
Hopkins Schools
1001 Highway #7
Hopkins, Minnesota 55343
Telephone: AC 612-935-5571 - Ext. 230

Human Resource Associates, Inc.
421 East Second Street
Hastings, Minnesota 55413
Telephone: AC 612-436-8631
AC 612-437-3976

OTHERS

St. Paul Open School
97 Central Avenue
St. Paul, Minnesota 55101
Telephone: AC 612-224-9421

[redacted] Project LEM
Director of Elementary Education
Maple Hill School
261 Maple Hill Drive
Hackensack, New Jersey 07601
Telephone: AC 201-488-4100

Institute for Political and Legal Education
c/O Educational Improvement Center-South
P.O. Box 426
Pitman, New Jersey 08071
Telephone: AC 609-589-3410

Assistant Superintendent
Rumson-Fair Haven Regional High School
Rumson, New Jersey 07760
Telephone: AC 201-229-4100 - Ext. 260

Curriculum for Meeting Modern Problems
(The New Model Me)
Lakewood Board of Education
1470 Warren Road
Lakewood, Ohio 44107
Telephone: AC 216-579-4267

Project SIMU-SCHOOL: Disseminating
Computer-Based Planning Resources
Through the Dallas Component
3700 Ross Avenue
Dallas, Texas 75204
Telephone: AC 214-231-6301

Drug Prevention Education
CESA #8
107 North Douglas Street
Appleton, Wisconsin 54911
Telephone: AC 414-739-1591

COMPENSATORY EDUCATION PROGRAMS IN THE NATIONAL DIFFUSION NETWORK*

Improvement of Basic Reading Skills (Project Information Package or PIP)
Sylacauga, Alabama
grades 1-8
reading lab (PSB '74-75)

Reading Improvement Project (PIP)
Flagstaff, Arizona
grades 2-12
reading lab (PSB '72-73) ('73 Fair)

Project Catch-Up-Keep-Up (PIP)
Tucson, Arizona
grades 5-8
reading labs & learning centers (PSB '74-75)

Project IRIT (PIP)
Hartford, Connecticut
grades 3-4
reading lab (small group, high intensity instruction)

Title I Reading Center
Fort Lauderdale, Florida
grades 1-6
reading lab (Right to Read or RTR)

Reading/English Rotation Project
Thomson, Georgia
grades 7-9
reading lab (PSB '72-73) ('73 Fair)

Project Conquest (PIP)
East St. Louis, Illinois
grades 1-6
reading lab (clinics & small group instruction) ('72 Fair)

Discovery Through Reading (PIP)
Clarkston, Michigan
grades 2-3
reading labs (small group instruction) (PSB '74-75)

Remedial and Corrective Reading (PIP)
Pender County, Burgaw, North Carolina
grades 2-12
reading lab stresses phonics (PSB '74-75)

Seaport (PIP)
Newport, Rhode Island
grades 2-8
adult tutors (PSB '72-73) ('73 Fair)

Help One Student to Succeed (HOSTS)
Vancouver, Washington
grades K-12 and adult
(PSB '76-77)

Programmed Tutorial Reading (PIP)
Farmington, Utah
grade 1
adult tutors (Office of Planning, Budgeting and Evaluation or OPBE)

Project Catch-Up (PIP)
Newport Beach, California
grades 4-8
(PSB '72-73)

High Intensity Tutoring (HIT) (PIP)
Highland Park, Michigan
grades 6-8
peer group tutoring in both reading and math (OPBE)

Pre kindergarten Education for the Disadvantaged Child (Predict I)
Cedar Rapids, Iowa
preschool
(PSB '76-77)

Florida Migratory Child Compensatory Program, Language Arts
Florida
K-6
(Migrants)

Early Prevention of School Failure for Migrant Children
Peotone, Illinois
4-6 year olds
(PSB '76-77)

Training Migrant Paraprofessionals in the Bilingual Mini-Head-Start
Pasco, Washington
preschool-grade 3, migrant adults
(Migrants)

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*There are 18 Compensatory Education Programs in the NDN. Eleven of these programs have been packaged as Program Information Packages which are being disseminated through the NDN.

Dr. Evans. I would be happy to do that.

Mr. Jennings. I have one last question. Now the Congress hopefully more in the future will see this trend developing of use of your types of evaluation in its renewal processes especially during oversight hearings so the pressures are less on congressmen so they can read the evaluations.

The other thing the Congress has to rely on in evaluating programs is the General Accounting Office reports. In this instance we have been told by the General Accounting Office, we have consulted with them about all the studies they are doing in the areas of programs that are under renewal, and they have told us they have self-initiated a study of your office which they have completed. They were asked if they would submit that for the record so that we could use that in the process of analyzing the evaluation activities within HEW. We were told that that report which they had completed was sent down to HEW and it took four months for HEW to submit comments on that report to be sent back to GAO.

It seems that you have some legitimate complaints to be made about how long it takes for your evaluations to be processed through different departmental layers, but why did you take four months to process your response to a General Accounting Office report on your office?

Dr. Evans. I am glad you asked that question. The fact of the matter is that the delay in that report was entirely the responsibility of the GAO. The 4-month procedure that you spoke of succeeded a period of comments going back and forth. I personally supplied the representatives in GAO with extensive comments on their report, very few of which they chose to take into account, a full year before. That study had been underway for a long period of time. The last meeting at which I made extensive comments and suggestions for revisions took place on November 15, 1976; GAO did not transmit the report to HEW for comments until February 22, 1977.

The time period you mentioned was a final period of exchange and debate over comments they had received and chose not to respond to us on for a period of time exceeding much more than four months.

Mr. Jennings. I think at this point in the record we will leave a space for the GAO to respond.

Dr. Evans. I am sure they will.

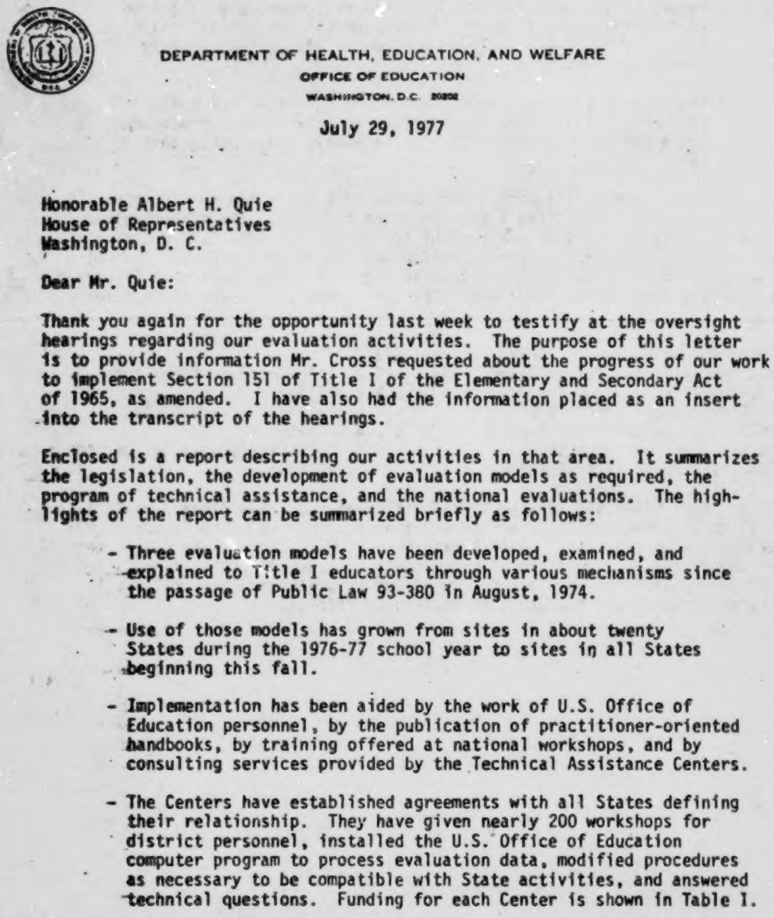
[See the GAO report at the end of this day's proceedings.]

Mr. Jennings. The chairman has decided to make their report, which is going to be submitted in August, they tell us now, an appendix to the record.

I would like to thank you on behalf of the chairman. The chairman wants to send down some questions to you in the form of a letter, and these questions will be put in the record. He would also want me to let you know he is calling you back on Title I so that we will have some specific testimony on Section 151 evaluation funds and how they have been used and how they will tie in with the Title I renewal. Those hearings will be in September or early October, for your information.

Thank you. I think it has been a very productive hearing. [Whereupon, at 11:30 a.m., the subcommittee adjourned .]

[Additional information submitted for the record follows:]



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

July 29, 1977

Honorable Albert H. Quie
House of Representatives
Washington, D. C.

Dear Mr. Quie:

Thank you again for the opportunity last week to testify at the oversight hearings regarding our evaluation activities. The purpose of this letter is to provide information Mr. Cross requested about the progress of our work to implement Section 151 of Title I of the Elementary and Secondary Act of 1965, as amended. I have also had the information placed as an insert into the transcript of the hearings.

Enclosed is a report describing our activities in that area. It summarizes the legislation, the development of evaluation models as required, the program of technical assistance, and the national evaluations. The highlights of the report can be summarized briefly as follows:

- Three evaluation models have been developed, examined, and explained to Title I educators through various mechanisms since the passage of Public Law 93-380 in August, 1974.
- Use of those models has grown from sites in about twenty States during the 1976-77 school year to sites in all States beginning this fall.
- Implementation has been aided by the work of U.S. Office of Education personnel, by the publication of practitioner-oriented handbooks, by training offered at national workshops, and by consulting services provided by the Technical Assistance Centers.
- The Centers have established agreements with all States defining their relationship. They have given nearly 200 workshops for district personnel, installed the U.S. Office of Education computer program to process evaluation data, modified procedures as necessary to be compatible with State activities, and answered technical questions. Funding for each Center is shown in Table I.

- The study of Sustaining Effects (a longitudinal evaluation designed to address questions implied by earlier evaluations concerning children's retention of skills) has produced a report on characteristics of schools nationwide and will soon yield preliminary findings on the economic and educational status of children receiving and not receiving compensatory education services.

- The work to publish regulations regarding use of the evaluation models is proceeding according to Departmental procedures, and a Notice of Intent will solicit public input early this fall.

As you know, Section 151 work is supported by a set-aside not to exceed .5 of one percent of the Title I appropriation annually. The set-aside has averaged just under .4 of one percent for the years 1975-77, and over 65% of the U.S. Office of Education portion has been directed toward improving State and local evaluation practices as required by the Section. Figures reflecting uses of the funds over that three-year period are shown below.

Total 151 set-aside FY 75-77	$23.4 million	
NIE appropriation for mandated study	-15.0 "	(about 65% of the total)
USOE portion	$ 8.4 million	
USOE supplement from P & E funds	+ 1.0	
USOE total to implement Section	$ 9.4 million	
Funds to upgrade practices	- 5.5 "	(a little over 65% of USOE total)
Funds for national evaluations	3.9 million	

Of the $9.4 million available to the Office of Education (including $8.4 million from the set-aside and an additional $1 million from Planning and Evaluation monies), $5.5 million have been used to support the development of models and the provision of technical assistance described above. The remainder, $3.9 million, has been used for an evaluation of the Title I migrant program and the Study of Sustaining Effects.

Our plans for fiscal year 1978 reflect a continuing emphasis on the improvement of State and local evaluations. We are currently discussing with States their needs for technical assistance consulting services in the upcoming period, and will be able at a later date to discuss more confidently the level of resources necessary to meet those needs. However, our best estimate at this time is that about $6 million will be necessary to adequately fund the Technical Assistance Centers. We will also publish more handbooks and support some developmental work by States under our program of technical assistance.

Other work to improve project evaluations in Title I includes the investigation of models in early childhood and migrant education. We will also be examining test and measurement issues which are critical to compensatory education evaluations. We estimate that funds to support both technical assistance and developmental efforts will be nearly $8 million (including the $6 million for the Centers), or almost 70% of the FY 1978 funds.

As I testified at the hearings last week, we agree with your observation of the need for an evaluation of the ESEA Title I program for handicapped youngsters. Our plans for FY 1978 include such a project as well as the continuation of our Sustaining Effects and migrant evaluations.

I understand that we will have special oversight hearings this fall regarding our work to implement Section 151, and I look forward to discussing our plans in more detail with you then. We would also welcome the opportunity to meet with you sooner or to provide additional information should you desire it.

Sincerely,

John W. Evans
Assistant Commissioner
Office of Planning, Budgeting
and Evaluation

Enclosures (2)

Table 1

FUNDING
ESEA Title I Evaluation Technical Assistance Centers

Region	Contractor	(In thousands) 9/76-7/77	(In thousands) 8/77-12/77
I	RMC Research Corp. Portsmouth, N.H.	$ 116.4	$ 189.9
II	Educational Testing Service Princeton, N.J.	108.0	70.0
III	National Testing Service Durham, N.C.	109.5	395.5
IV	Educational Testing Service Atlanta, GA.	112.5	99.8
V	Educational Testing Service Evanston, Ill.	112.4	122.0
VI	Resource Development Institute Austin, Texas	120.6	107.9
VII	American Institutes for Research Palo Alto, Cal.	118.0	91.6
VIII	Northwest Regional Education Laboratories Portland, Ore.	114.8	122.4
IX		111.6	111.0
X		109.8	59.3
	Total	$1133.6	$1369.4

Total for 9/76 - 12/77 (15 months) = $2,503,000
Total anticipated for 1/78-7/79 (19 months) = $12.6 million
(from FY 78 and 79 monies)

IMPLEMENTATION OF SECTION 151 OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965

TITLE I

U.S. Office of Education
Office of Planning, Budgeting,
and Evaluation
July, 1977

This paper presents a brief description of activities in the Office of Planning, Budgeting, and Evaluation to implement a new type of evaluation requirement in Title I of the Elementary and Secondary Education Act of 1965 (ESEA). The paper is organized into three sections: "Background" which describes the legislation; "Section 151 activities," which briefly discusses the work; and "Summary."

I. Background

Title I of the Elementary and Secondary Education Act of 1965 (Public Law 89-10) states that the policy of the United States will be "to provide financial assistance ... to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means ... which contribute particularly to meeting the special educational needs of educationally deprived children" (ESEA, Title I, Section 101, "Declaration of Policy"). In the years since its enactment, the annual appropriations have grown from $949 million to over $2 billion, and the funds have been used in increasing proportions to provide remedial services in the basic skills (reading and math, primarily) to low-achieving students (Wargo, Tallmadge, Michaels, Lipe and Morris, 1972; Trismen and Waller, 1976; NIE, 1976).

Title I is a categorical grant program that appropriates funds to State Educational Agencies (SEA's) for distribution to their eligible and participating school districts which, in turn, bear primary responsibility for designing and implementing their projects. Evaluation of the impacts of Title I services is required at all three levels: local, State, and federal. As stated in Section 141(a)(6) of Title I, a local educational agency must assure its State

> "that effective procedures, including provisions for appropriate objective measurements of educational achievement, will be adopted for evaluating at least annually the effectiveness of the programs in meeting the special educational needs of educationally deprived children."

Similarly, a State must assure the U.S. Commissioner of Education

> "that the State educational agency will make ... periodic reports (including the results of objective measurements required by Section 141(a)(6)...) evaluating the effectiveness of payments under this title and of particular programs assisted under it in improving the educational attainment of educationally deprived children ..." (ESEA, Title I, Section 142(a)(3)).

The Commissioner of Education is required by the General Education Provisions Act (Section 417(a)(1)) to report to Congress annually on the effectiveness of all educational programs in achieving their legislated goals.

Attempts at the federal level to use data from the State annual evaluation reports to satisfy this last reporting requirement have been frustrated by the lack of comparability of the data in them. In an attempt to deal with this problem, Congress amended Title I in 1974 with the addition of Section 151, which lists specific activities required of the Commissioner. The subsections of Section 151 can be summarized as follows:

"The Commissioner shall

(a) provide for independent evaluations which describe and measure the impact of programs and projects assisted under this title ...

(b) develop and publish standards for evaluation of program or project effectiveness ...

(c) where appropriate, consult with State agencies in order to provide for jointly sponsored objective evaluation studies ...

(d) provide to State educational agencies, models for evaluations of all programs conducted under this title ... which shall include uniform procedures and criteria to be utilized by local educational agencies, as well as by the State agency ...;

(e) provide such technical and other assistance as may be necessary to State educational agencies to enable them to assist local educational agencies in the development and application of a systematic evaluation of programs in accordance with the models developed by the Commissioner;

(h) develop a system for the gathering and dissemination of results of evaluations and for the identification of exemplary programs.

Subsection (f) of Section 151 describes the models further as specifying "objective criteria" and "outlining techniques and methodology" for producing data which are "comparable on a statewide and nationwide basis." Subsection (g) requires a periodic report on the activities of this Section.

As you can see, those requirements outline a comprehensive, complete evaluation program: conduct evaluations, upgrade evaluation activities at other administrative levels so that reported data are valid and comparable, use those data to---among other things---identify especially effective instructional practices, and disseminate information about those practices. The evaluation program outlined is complete in that the steps in the legislation require that the feedback loop be closed: that is, they specify that the information from evaluation findings must be disseminated and then used to refine program operations.

Another observation about the legislation is that complementary activities are required. The Second 151 evaluation program requires and is strengthened by its reliance on two mutually dependent but different strategies. The primary strategy is the use of data compiled and reported upward from the local and State agencies to USOE. Those data will provide an information base which has the qualities of recency (because the data are reported annually) and of breadth (because most if not all of the Title I projects in the nation will be reporting).

The second strategy stated in the Section is the use of Federal studies to measure the impact of the program nationally. The information base generated through this strategy has the qualities of efficiency (data are collected only on a sample of sites nationwide) and of depth (more data can be collected in each of those sites, beyond that possible through self-reports). Each strategy also has its weaknesses: quality control in the reporting system, and infrequency with the national studies. Together, however, the two strategies can adequately and efficiently provide answers to most administrators' questions.

A third observation about the legislation is that it presents a real challenge to federal, State, and local Title I administrators and evaluators. It calls for a mutual effort to document their programs' operations and impacts and highlights specific approaches for facilitating such an accomplishment. Those approaches are consultation among the parties at all administrative levels, the use of models as a structure for generating comparable data, and the provision of technical and other assistance in support of that structure.

USOE personnel would like to see this mutual effort be one eventually which reaches across all Title I program areas and sites. It will represent a joint commitment by all Title I educators (those in regular schools, in migrant education, in State institutional programs---wherever children are receiving Title I services) and emphasizing basic skills alone or in conjunction with other goal areas such as attitudinal improvement, health, or attendance. The challenge for all of them will be to provide policy-makers at all levels with the information necessary to make important decisions about the program. That day may be quite a few years off, but initial reactions to this work suggest that such an objective is not totally unrealistic.

The goal of this evaluation program follow closely the requirements of the Section and the guidance offered in hearings during its passage and the passage of related legislation. The goals can be stated as follows:

(1) to effect the use of local and State evaluation and reporting practices which yield comparable data nationwide;

(2) to develop and implement a system of evaluation models as the structure for ensuring that the data being collected are valid and comparable;

(3) to provide such technical and other assistance as necessary to enable States to adopt the models and to further their adoption---or modification as necessary---in local school districts;

(4) to evaluate the program nationally; and

(5) to disseminate information about effective practices as identified and validated through any of the above activities.

II. USOE activities to implement Section 151

A variety of activities have been undertaken to fulfill the legislation discussed above. They are described below under five main categories: (a) the proposed evaluation system, (b) the technical assistance program to support its adoption, (c) specific implementation projects, (d) national evaluations, and (e) the dissemination of information about exemplary Title I activities.

A. The proposed evaluation system

The Division for Education of the Disadvantaged (of the Bureau of Elementary and Secondary Education) and the Office of Planning, Budgeting, and Evaluation have several times tried to use data in State annual evaluation reports as a source of information about program practices and impacts (Wargo, *et al.*, 1972). Those efforts were hampered by the lack of uniformity in the reports as described above, and a project was undertaken in June, 1974 to remedy the situation. The passage of Section 151 about 2 months later provided an additional impetus to the work. Specifically, the Contractor (RMC Research Corporation of Mountain View, California) was to

(1) interview policy makers in both the Executive Branch and Congress to determine their information needs;

(2) review four years of State Annual Evaluation Reports (for FY 71, 72, 73, 74);

(3) draw conclusions if possible about the Title I program;

(4) assess the degree to which common reporting practices might be adopted nationwide to serve policy-makers' needs;

(5) recommend some such practices; and

(6) check the feasibility of the suggestions with administrators and evaluators in a small sample of states (Gamel, Tallmadge, Wood, and Binkley, 1975).

This developmental effort was completed, and a project was begun to visit all States and territories as well as three local school districts in each to discuss the newly developed prototype system and its implications (Bessey, Rosen, Chiang, and Tallmadge, 1976).

Throughout both projects two advisory groups have been relied upon for recommendations and feedback. One panel, the Policy Advisory Group, consisted of State Title I program administrators, State evaluators, local program administrators, local evaluators, parents, and representatives from both the National Advisory Council on the Education of Disadvantaged Children and the Council of Chief State School Officers.

The second panel, the Research Advisory Group, included nationally recognized experts in the areas of evaluation methodology, measurement, and criterion-referenced tests. They have reacted to plans, suggested changes, and provided advice through all phases of the work. Such input has also been solicited from State and local administrators during the site visits and USOE - sponsored meetings.

The main features of the currently proposed evaluation system are shown on Table I. As you see, the system distributes responsibilities across all program levels and allows flexibility in choice of comparison group and type of test instrument used.

Those choices are structured by the system to fall among three evaluation models which can incorporate data from achievement tests with or without national norms. Each model compares the growth of the Title I project children to that of a different group of children: (a) in one case, that comparison group is the children in a test publisher's norming sample who scored the same on the pretest as the project participants (hence, the model is called "Norm-referenced); (b) a second alternative is the use of local comparison group of children who are like Title I participants but who receive no compensatory services (the "Control---or Comparison---Group" model); (c) a third possibility is the use of a local group of children who are not like the Title I participants in that they all scored higher on a pretest (the "Regression Approach"). There will also be provisions for the approval of the use of alternative models and variations as long as each satisfies general technical standards of the system and generates comparable data.

Each of the three currently available cognitive evaluation models -- and any alternative which may be approved for use in specific sites -- provides an answer to two questions: (1) how much did the Title I children improve their performance between pretest and posttest and (2) how much would they have improved anyhow (due to maturation, regular school classes, greater familiarity with standardized testing situations, etc.). Hence, all models will have at least two things in common: (1) the necessity of pretest and posttest information and (2) the necessity of that same information about a comparison group for estimating a "baseline" for the Title I children's growth without a project.

Table 1 Summary of the Main Features of the Title I Evaluation System

Features of the models

- designed for regular district programs stressing basic skills
- information reported on impacts, cost, numbers of participants, hours per week of instruction, parent activities, and staff training
- LEAs/SEAs have choice of three evaluation models
- LEAs/SEAs have choice of basic skill tests (including criterion-referenced)
- results are converted to a common scale so that they can be compared and aggregated
- detailed but relatively simple procedures and formats are prescribed for LEAs/SEAs to use in reporting results

Timing

- use in sites during school years 75-76 and 76-77 on trial basis
- technical training of SEAs in fall of 1976 and continuing
- proposed rules in fall, 1977
- final regulations in early spring of 1978

Responsibilities

LEAs

- choose evaluation model and test instrument
- purchase tests and arrange for testing and other data collection
- insure that correct data gathering procedures are followed:
  e.g., tests are administered at correct time and under correct and uniform conditions; all appropriate children are tested
- score tests or have them scored
- report results to SEA in appropriate format
- use results for local administrative decision-making

SEAs

- provide technical assistance to LEAs directly or through Technical Assistance Centers
- verify accuracy of LEA reports
- aggregate data and report results to OE
- use results for State monitoring and follow-up

OE

- develop and modify models as necessary
- issue regulations
- publish technical assistance materials
- provide technical assistance to SEAs, directly and through Technical Assistance Centers
- verify accuracy of SEA reports
- aggregate data and report results to Congress
- tabulate and distribute reports to other interested administrators
- disseminate information about especially effective practices

That second necessity is the one which will impose the most constraints on evaluation practices. For example, if a project chooses to use Model A, the norm-referenced approach, it will be relying on a publisher's norm group for the "baseline" and will need the same pretest - posttest information on project participants as the test has for its norming sample. That is, if test scores are available for October and May for the norming sample (or only at one time or the other), that is when they must be collected from the project children. Hence, a major implementation requirement with Model A is adherence to a schedule in which pre-and posttests correspond to the norm dates of the test.

Reliance on a local group of children similar to those in the Title I project for answering the second question above removes the test schedule constraint but necessitates others regarding the similarity of the two groups of children and the witholding of compensatory services from the comparison group of supposedly equally needy children. The use of random assignment to project and "control" conditions is not possible since it is the intent of the program to serve the neediest children. Hence, data from a "comparison" group of similar, but not equivalent, children are used, and statistical adjustments eliminate, as much as possible, alternative hypotheses that rival exposure to Title I to explain the project group's differential improvement.

Reliance on a local group of children completely dissimilar from the project participants avoids the timing and withholding-of-services constraints but introduces considerations regarding the statistical assumptions of regression analysis. For example, because a regression line is used to predict the project children's posttest scores without a project, that line must be based on a sufficient number of comparison group children to be adequately stable and accurate.

Despite the various constraints necessary to make each model valid, the provision of three alternative approaches -- each accomodating various types of test scores -- will make the system usable in most situations. As exceptions arise, however, States will be able to propose an alternative which will then be judged as to its methodological validity and its ability to generate data comparable to that of the regular evaluation system. If it is found to be adequate in both regards, it can then be used instead of one of the three described above.

The system is built upon evaluations of project effects at the local level and concentrates on the validity of those estimates. Evaluators are advised to choose the most sensitive test instrument to measure progress in achieving project goals; they are also advised to select the most appropriate basis of comparison for their Title I children such that the estimates of their growth without the project will be as accurate as possible. Since each model, if implemented correctly, will yield an unbiased estimate of a project's effects, aggregating results across models is possible.

The system, then, allows the aggregation of unbiased, project-valid estimates of the effects of Title I services. Those estimates are expressed in one metric to make such aggregation possible. That scale is one of transformed standard scores having a mean of 50 and a standard deviation of 21.06. These parameters were derived to make this scale of "Normal Curve Equivalents" (NCE's) match the percentile distribution at 1,50, and 99. Figure 1 on the following page shows the relationship between standard deviation units (z scores), stanines, percentiles, and NCE's.

In short, the evaluation system is one of three basic models --- and others as approved --- which can incorporate different types of test scores. It is one which is implemented at the local project level and uses the project as the unit of analysis throughout: that is, project descriptors such as enrollment, cost, hours of exposure and an estimate of average gain are computed and reported to higher administrative levels (local school districts, intermediate districts, State offices, etc., as appropriate in particular settings).

A system of forms and instructions for implementing each model has also been developed. Some States have indicated that they will adopt the forms for collecting the necessary information from their school districts; others will simply modify their current forms, especially in those cases where a consolidated form is used for locals to report on all State or federal programs. States are encouraged to augment the required information with other data necessary for their own administrative activities.

The three models are most amenable to the evaluation of project outcomes in compensatory education projects aimed at raising children's performance in the basic skills. Developmental work is underway to formulate evaluation models for migrant education projects and for projects serving neglected or delinquent children. Those efforts are being performed in conjunction with national evaluations of those programs and are discussed later in Section D.

Developmental work is also underway to formulate evaluation models and a reporting system documenting the provision of supportive, non-instructional services to Title I children. A national reporting system for documenting the nature and extent of such services in Title I programs will be developed and discussed with Title I personnel at all levels. It will most likely be concerned with non-instructional services delivered to children: health, dental, nutrition, and psychological and social services, including guidance and counseling. Evaluation models and procedures appropriate for use by local education agencies in their own evaluation efforts will also be developed and made available to them.

Various State and local project personnel have requested that evaluation models be developed for assessing the effects of early childhood Title I activities. A project to do this will begin soon. It will involve interviewing a sample of project administrators and evaluators surveying the types of services offered through Title I early childhood programs, formulating recommendations, and getting feedback from the project personnel about the feasibility and usefulness of the recommended procedures. A limited field test may be implemented before evaluation models are disseminated.

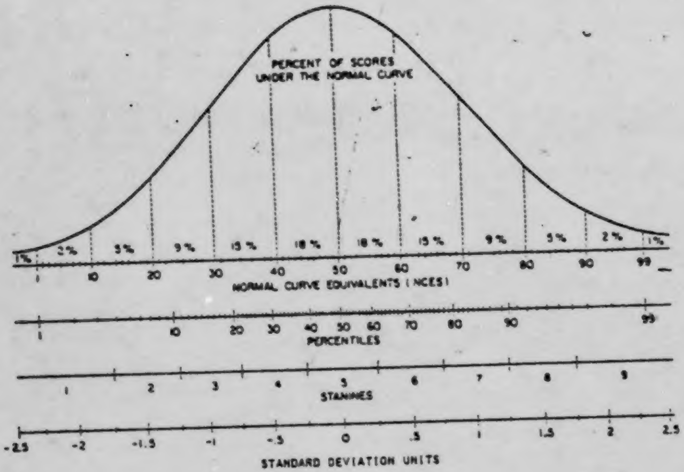


Figure 1. Area under the normal curve divided into NCEs, percentiles, stanines, and standard deviation units.

taken from Tallmadge and Wood
(October, 1976-draft, p. 9)

An effort is also underway to develop ways of assessing children's affective or socio-emotional development. Various types of those characteristics, measurement instruments, and analysis methods are being described in a user-oriented evaluation handbook. Whereas the evaluation approach may vary according to project goals in this area and data reported may not be easily aggregated beyond a tabulation of projects attempting-versus-achieving such objectives, the provision of advice regarding valid methods will be helpful in upgrading evaluation practices.

B. The Technical Assistance Program

USOE activities to support State and local use of the evaluation system involve three types of assistance in addition to that provided by federal Title I and evaluation staff members. The three components are the provision of evaluation guidebooks, of national training sessions for State administrators, and of free, on-site consulting services.

The publications series consists of practical handbooks in various areas of evaluation. Two are available from the Government Printing Office: *A Practical Guide to Measuring Project Impact on Student Achievement* (document 017-080-01460) and *A Procedural Guide for Validating Achievement Gains* (document 017-080-01516). They establish a series of decisions to be made in planning and conducting an evaluation or in validating the results of evaluations, respectively. Available almost a year, the first of the series has sold over 8000 copies; the second has sold 3000 in four months.

Others in the series will address the problems of assessing children's affective development, of examining achievement tests for bias, of managing a large-scale testing program, of using criterion-referenced tests, and of estimating standard project costs. They will become available throughout the next year.

The national evaluation workshops were offered in ten locations during the late fall and early winter of 1976-77. Each State sent about four staff members, on the average, to the three-day sessions which involved presentations on research methodology and the evaluation models. Participants also worked through examples and discussed particular implementation situations. The workshop materials will be revised and made available upon request.

The Technical Assistance Centers were established under contract to the Office of Education to provide consulting services to States implementing the Title I evaluation and reporting system. Personnel in the Centers work under contract to USOE to provide detailed, site-specific, technical advice to States, and at a State's discretion, to LEA's. During the school year 1976-77, their work has involved the establishment of operating agreements with each State, attendance with clients at the ten USOE-sponsored national evaluation workshops, the conduct of nearly 170 State-sponsored training workshops, the definition of SEA needs regarding solutions to specific technical problems, and the formulation of plans for the most efficient integration of the Title I evaluation and reporting requirements into existing State systems. Work in this last area has included planning for the use of State assessment data in the evaluation system, modifying State report forms, defining computer needs, and preparing monitoring guides. The reception to the services has been very positive and requests for help continue to increase.

C. Specific implementation projects

The school year of 1976-77 has been very important for getting the new evaluation system "off the ground." Staff members in the Office of Planning, Budgeting, and Evaluation as well as in the Division of Education for the Disadvantaged have been very active in encouraging States and locals to adopt the models before any mandate is established. Their efforts have been successgul in many sites, and a field test or implementation study is underway in those settings.

Organized and conducted in-house, the study will involve documenting the problems and solutions of people using the models and reporting the data. Five States mandated use of the system statewide for school year 76-77; several organized implementation in a selected group of their school districts; several encouraged any local effort possible. Hence, there will be many configurations to examine, and different types of experiences to document.

The school year 77-78 will provide a more comprehensive view of the system in use. Nearly all States will have some districts using the evaluation models; in some cases, the usage will be statewide by State mandate.

Another activity to facilitate the implementation of the evaluation system is the publication of a newsletter sent to all States and school districts nationwide. It describes activities at the Federal level and encourages readers to submit questions, etc. for an ongoing dialogue. Also as part of that dialogue, there is an "SEA column" and an "LEA column" for different authors each edition to describe their experiences in choosing a model, or modifying one to meet individual needs, or explaining it to interested parties. Occasionally a parent will be invited to write an article about his or her experience reviewing evaluation reports, etc. The newsletter is published quarterly and will be informative in a somewhat informal tone.

A major project underway in-house is the drafting of regulations to require use of the standard evaluation models or an approved alternative. A legal analysis of Section 151 and discussions with USOE Title I program administrators have suggested that regulations are required. The intent is to keep them brief and simple.

We are uncertain of the details, but anticipate that the regulations will include: (1) a set of general technical standards that evaluation procedures must meet (e.g., evaluation procedures used will yield estimates of student gain that can be expressed in normal curve equivalents; if sampling used, then procedures must yield an unbiased estimate of student gain, etc.) and (2) a brief description of the major requirements of the three models that have been developed to date. We anticipate that the regulations will require an LEA to use one of the three models outlined. However, an approval process will be defined for allowing an LEA or SEA to vary one of the requirements of one of the models or to use an alternative model, as long as the technical standards of the system are met.

Such requirements will be published in the Federal Register as soon as possible, according to the Secretary's procedures for developing and publishing regulations. After discussion of issues identified in a Notice of Intent, proposed rules will appear in the fall of 1977. Following the period of comment and revision, final regulations could possibly appear in the spring of 1978, affecting evaluations of projects thereafter.

D. The national evaluations

National studies to describe the provision of Title I services nationwide and the benefits attributable to them provide necessary programmatic information to policy-makers at all levels and complement the activities to upgrade State evaluation capabilities.

The three ongoing national evaluations have several objectives in common, whether the target population be children in migrant projects, in institutions for the neglected or delinquent, or in regular schools over a period of a few years. Those common objectives are as follows:

(1) to describe the children chosen for Title I projects and the services they receive (both instructional and non-instructional),

(2) to assess the impacts of those services on their cognitive and attitudinal development,

(3) to examine the relationship between program characteristics and student outcomes, and

(4) to identify especially effective educational practices.

Individual studies also have project-specific objectives. For example, one goal of the evaluation of the Title I migrant education program is a validation of the data in the Migrant Student Record Transfer System as they are used for State allocation purposes. Similarly, the Study of the Sustaining Effects will address the additional objective of determining the most effective sequencing of different types of educational experiences for low-achieving students. A survey incorporated into this study will also produce the report required in the General Education Provisions Act 417(a)(2) regarding the numbers of economically and/or economically disadvantaged children who do and do not receive compensatory education services. Each of the three national evaluations is described more in detail in brochures available upon request.

The new reporting system and the national evaluations complement one another in a variety of ways including:

° The reporting system has been designed to provide LEAs with flexibility as to choice of measuring instruments and evaluation designs. This feature increases the likelihood that LEA evaluations will be useful at the local level. However, as a consequence of permitting flexibility, the system necessarily introduces a certain imprecision and ambiguity when the data from a variety of instruments are aggregated across LEAs and SEAs. The national evaluations each have the advantage of a uniform design, a single set of measuring instruments, and carefully controlled data collection procedures. This means that the occasional national evaluations provide a more precise indication of the national impact of Title I and can also serve as a check against the more frequent but broader-brush assessments provided by the aggregation of LEA data.

° The reporting system has also been designed to minimize data burden for the LEAs. This means, for example, that very little information is reported about Title I project characteristics and that, consequently, little can be said regarding the relationship between such characteristics and successful student outcomes. The national evaluations, on the other hand, are designed especially to detect such relationships when they exist.

° The national evaluations involve very small samples of LEAs because large samples are not necessary for estimating the overall national impact of a program. As a consequence, however, national evaluations provide estimates of local impact for only a few hundred LEAs. The reporting system will provide State level estimates, subject to the limitations of the aggregating procedures, and, depending upon State decisions about sampling, as many as 14,000 LEA impact estimates. These project data, available through the reporting system, will also be useful for identifying especially effective practices because more projects are described by them than by national evaluations.

° One of the strengths of the reporting system, in addition to flexibility, is its relative simplicity. Though it demands adherence to certain procedures, it avoids highly intricate evaluation manipulations. For example, there is no requirement for reporting longitudinal data (i.e. two ore more outcome measures on the same child and separated by an interval of greater than one year) because this would greatly increase the complexity of the system and the cost to LEAs. (If LEAs choose to carry out longitudinal evaluations, they will, of course, be compatible with the system.) However, the answers to some Title I evaluation questions depend upon logitudinal outcome data and these can be well handled by the national studies at far less expense than with the reporting system. The ongoing Study of the Sustaining Effects of Compensatory Education exemplifies this point.

E. Dissemination of information about effective practices

Effective educational practices in Title I projects continue to be identified and validated through (1) discovery in national studies and (2) self-nomination and approval by a joint USOE/NIE Dissemination Review Panel. When the evaluation models are implemented and data from all projects are comparable at State and federal levels, the identification of exemplary projects can become more systematic.

Thirty-four Title I projects have been approved by the Dissemination Review Panel. Following such approval, information about the projects is distributed to new sites through the USOE-sponsored National Diffusion Network. In addition, twelve of the approved Title I projects have been described in Project Information Packages designed to facilitate their installation in interested school districts. Six of these are currently being disseminated by the Network while the other six are awaiting field testing.

III. Summary

Activities to implement Section 151 of ESEA Title I have been underway since summer, 1974. They have involved (1) the development and examination of some standardized evaluation models, (2) definition of further developmental work for program areas not covered by those models, (3) establishment of a technical assistance program to facilitate use of the standard procedures, (4) efforts to study the models in the field, (5) preliminary work to formulate regulations, (6) national evaluations of program services, and (7) identification of exemplary practices uncovered through all these avenues.

Many people at all program levels---including Federal staff, State administrators and evaluators, local school personnel, parents, and members of the research community---have been involved in the work, and the effort continues to benefit from their input.

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July 21, 1977

Dr. John W. Evans
Assistant Commissioner
Office of Planning, Budgeting, and
  Evaluation
U.S. Office of Education
Room 4079 FOB 6
400 Maryland Avenue
Washington, D.C. 20202

Dear Dr. Evans:

At today's hearing on H.E.W. planning and evaluation activities in the area of education, you were notified that I would send down to you a letter containing additional questions which we would appreciate having answered for the record. These questions are attached to this letter, and we would appreciate very much receiving your response by August 5th.

Thank you very much for your appearance today. From what I understand, the hearing was very productive and I am sure that it will be helpful to the members as we revise all of these programs.

Sincerely,

Carl D. Perkins
Chairman

CDP:Jp

1. As you know the Congress has sought to secure timely and valid evaluation information through appropriating funds for evaluations and setting aside funds for evaluations from program funds. We have also directed the Office of Education to submit an annual evaluation report as well as renewal evaluation reports. Could you please give us your best opinion on how those provisions in the General Education Provisions Act could be improved to be a more effective device for securing sound evaluations which can be of use to us? We would appreciate this being as specific as possible in recommending changes.

2. In the past, you have been critical, and rightfully so, about the non-uniform manner in which Congress mandates studies and legislation. You have been especially critical as to the time periods specified for these evaluations and the prescriptive provisions contained in these mandated studies. Now may be the proper time to try to bring more uniformity to Congress' methods for mandating such studies. Therefore, I would appreciate receiving from you your best opinion on how we might bring more uniformity to such mandates for studies.

3. (a) How do you intend to comply with the General Education Provisions Act (20 U.S.C. 1226c) requirement that in the annual evaluation report to the House Committee on Education and Labor and the Senate Committee on Human Resources HEW set forth goals and specific objectives in qualitative and quantitative terms for all OE programs and relate those goals and objectives to program purposes?

(b) What hasn't HEW complied with this requirement to date?

(c) Don't OE's national program evaluations implicitly contain such specific objectives and, if so, why shouldn't such specific objectives used for evaluation purposes be made explicit, as legislatively required?

4. (a) In reference to Elementary and Secondary Education Act, Title I evaluation models, OE officials have indicated that accomplishing successful implementation for 14,000 school districts is doubtful

or at least questionable. They noted that the problems are not only methodological and fiscal but also political. In view of this, is it realistic to try to serve the information needs of Federal (including the Congress), State, and local levels with information based on local agency evaluations?

(b) The Title I evaluation models are based on assumptions about such things as the common scale used in the models, the soundness of the tests employed, and whether those tests are similar enough to provide data that is truly comparable. Since these assumptions are based on compromises, what, in your view, are the chances that these compromises will be acceptable for providing evaluation information useful at Federal, State, and local levels?

5. (a) What efforts are planned or are underway which address alternatives to standardized norm-referenced achievement tests for uses which include program evaluation?

(b) What research efforts are planned or underway which address the nature and extent of racial, sexual, and cultural biases in standardized tests and how such biases may be reduced?

6. In the past it seems OE gave little attention and priority to procedures, such as the issuance of its policy implication memorandums, which are designed to assure implementation of its evaluation study results. What is OE doing to improve the implementation of those results?

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

The Honorable Carl D. Perkins
Chairman
Committee on Education and Labor
House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Thank you for your letter of July 21, 1977 and the six questions on planning and evaluation in education. I appreciate the opportunity to amplify the answers given then and to make more specific recommendations.

Question 1. As you know the Congress has sought to secure timely and valid evaluation information through appropriating funds for evaluations and setting aside funds for evaluations from program funds. We have also directed the Office of Education to submit an annual evaluation report as well as renewal evaluation reports. Could you please give us your best opinion on how those provisions in the General Education Provisions Act could be improved to be a more effective device for securing sound evaluations which can be of use to us? We would appreciate this being as specific as possible in recommending changes.

The basic authority for planning and evaluation activities in G.E.P.A. is adequate. The problem lies rather with the funding for those activities. At present, we have the Section 416 authority for the Planning and Evaluation ("P&E") line item in the OE budget, and we have legislative authority for program set-asides in Title I, ESAA, Follow-Through, Packaging and Dissemination, and Right-to-Read. Where there is a recurring program set-aside, we are able to plan and implement evaluations and technical-assistance activities in a consistent, comprehensive manner. But for the vast majority of OE programs, evaluations must be funded from the P&E budget, and competition is extremely strong for these limited resources as the Annual Evaluation Plan is developed each year. As a result, some OE programs have not been evaluated at all, others have not been evaluated for too long a time, and still others are having less evaluation done than we and OE program managers would like. The P&E line item itself, of course, is vulnerable each year as Appropriations Committees look about for areas other than operating programs in which to make cuts. One frequent consequence is the postponement of a needed study because of limited P&E funds and the resulting loss of timeliness in the production and reporting of evaluation findings.

My recommendation is for a legislative change from the Section 416 authority with a line item appropriation to a new authority for the Commissioner of Education to use up to a fixed percentage of all program monies administered by OE in order to conduct planning and evaluation activities. The funds thus made available should be used to evaluate all OE programs without restriction, i.e., monies drawn from a given program's funds would not necessarily be spent to evaluate that program but could be used to support evaluations of other programs. The Commissioner would have full discretion over how much money to set aside from program funds (within the established legal limit), how to take that money, and how to use it in support of evaluation activities. I believe that only a standard set-aside of this kind from all OE program funds will enable us to plan and conduct a consistent, substantial evaluation activity and to ensure the timely production and delivery of evaluation results and recommendations.

Question 2. In the past, you have been critical, and rightfully so, about the non-uniform manner in which Congress mandates studies and legislation. You have been especially critical as to the time periods specified for these evaluations and the prescriptive provisions contained in these mandated studies. Now may be the proper time to try to bring more uniformity to Congress' methods for mandating such studies. Therefore, I would appreciate receiving from you your best opinion on how we might bring more uniformity to such mandates for studies.

If the Congress makes the legislative change that I have recommended above, we would have authority and ability to receive ample funds for evaluations in all program areas. Two problems would remain, however, and my definition of them and recommendations for them follows:

(*) the due dates for mandated reports are often unrealistic, given the time lines that necessarily result from the process of designing a study, going through the contract-procurement cycle, implementing the study (which includes the still-growing, enormously burdensome and time-consuming series of forms clearances that we must go through), and reporting our findings. Let me point out that forms clearance, which used to require 2 or 3 months, now is likely to require 4 to 6 months as a result of requirements resulting from legislative and administrative efforts to reduce the Federal paperwork burden on respondents. The consequence again is that studies are delayed or postponed to the detriment of the timeliness and relevance of their findings. My recommendation is that your Committee consult with us in drafting the legislation for mandated studies so that you have our views on feasible time lines and due dates.

(*) legislative specifications for mandated studies occasionally overlap studies that we have already planned or may already have begun. The result may be difficult adjustments or formal amendments to the scope of work of a study or last-minute upheavals in our Evaluation Plan. Here again, I recommend that your Committee consult with us in drafting the legislation so that we may make early adjustments to our studies or plans, or you may make adjustments to study specifications, in ways that will promote efficiency and timeliness on our part in meeting the information needs of the Congress.

Question 3. (a) How do you intend to comply with the General Education Provisions Act (20 U.S.C. 1226c) requirement that in the Annual Evaluation report to the House Committee on Education and Labor and the Senate Committee on Human Resources HEW set forth goals and specific objectives in qualitative and quantitative terms for all OE programs and relate those goals and objectives to program purposes?

(b) Why hasn't HEW complied with this requirement to date?

(c) Don't OE's national program evaluations implicitly contain such specific objectives and, if so, why shouldn't such specific objectives used for evaluation purposes be made explicit, as legislatively required?

In my testimony of July 21, I noted that very many of the laws authorizing the more than 100 programs administered by OE do not prescribe clearly what the programs objectives or quantified goals should be. In other cases, program goals and objectives have been assigned to local or State definition or interpretation, by legislative design. Attempts to sharpen legislative definition of program goals has often met opposition from Members of Congress who disagree with a focus on basic skills, for example, or who insist on local discretions to include an array of project activities which imply corresponding goals and objectives. The point is that Congress alone has the major responsibility for specifying program objectives (as recognized also by the GAO report on evaluation of Federal education programs) but has also, on occasion, resisted efforts by OE to establish specific objectives in the name of Congressional, local or State prerogatives.

We have been fully aware of the requirement you refer to and have tried to meet it, only to find that, on the basis of the legislation and discussions with OE program managers and members of State and local agencies, we could not realistically and honestly agree on the specificity and detail which would meet that requirement. I recommend to you that our staffs work together to identify those programs for which the legislation is sufficiently specific about goals and objectives, or for which agreement in the Congress can most readily be reached on specifics of nationally defined objectives, so that my office may better meet that requirement in those cases. For all other OE programs, I frankly recommend that the requirement be terminated as a large source of frustration and wheel-spinning for my staff and, perhaps, for your Committee as well.

We do try in our evaluations to measure the objectives and activities stated in the legislation, emphasizing those that seem most important. We will try to define objectives ourselves, when necessary. But our definitions of goals or objectives do not have the force of law, could not be embodied in program regulations, and could not be "enforced" by OE. Furthermore, it is not infrequent for OMB to disagree with us, when we go to them for forms clearance, on the objectives that we have defined and the measurements that we have proposed to take. They too will raise the issue of Congressional, State and local discretion in defining goals and objectives--thereby contributing, incidentally, to delays in clearance and further loss of timeliness in reporting our findings.

Question 4. (a) In reference to the Elementary and Secondary Education Act, Title I evaluation models, OE officials have indicated that accomplishing successful implementation for 14,000 school districts is doubtful or at least questionable. They noted that the problems are not only methodological and fiscal but also political. In view of this, is it realistic to try to serve the information needs of Federal (including the Congress), State, and local levels with information based on local agency evaluations?

We feel it is not realistic to serve all decision-makers' needs by data in local and State evaluation reports. Specifically, your question recognizes our continued caution in anticipating (a) State and local reactions to required standard evaluation procedures, (b) the fidelity with which they will adhere to the procedures, and (c) the degree to which Federal decision-makers should rely on this source of information for evaluating the Title I program nationally.

As I noted in my testimony, the reaction to the models has in general been more positive than we had expected. In many cases there have been acknowledgment of the superiority of the new methods over the old ways. In addition, use of the methods is increasing rapidly. It is important to note, however, that the increase of usage is on a strictly voluntary--albeit strongly encouraged--basis. We can safely predict that when use of the models is required by program regulations and is no longer voluntary, there will probably be a more noticeable negative reaction.

The degree of adherence to required procedures is another issue. We have already seen that project personnel may conscientiously use one of our evaluation models, yet fail--for one reason or another--to follow completely the prescribed set of procedures. The seriousness of the error will vary, of course, but we must recognize that quality control will continue to be a concern as we plan the uses of these data at the various administrative levels.

There has been considerable debate concerning Section 151 and the proper balance of emphasis on its various provisions. I believe we have reached agreement that the purpose of the section is primarily to upgrade State and local evaluation practices, and secondarily to evaluate the program through national studies. We feel, further, that the section is designed to serve different needs, and the extent to which those needs can be met by a common set of activities is yet to be determined.

Our dual strategies--the use of local and State data as well as data from national studies--for evaluating this program are complementary and equally necessary for guaranteeing a strong, relevant, credible body of information for decision-making about Title I. To understand this, one must contrast the strengths and weaknesses of each strategy for producing different types of information. Six such contrasts are outlined below.

Data will be generated annually by the evaluation and reporting system because it incorporates the State and local reports required by the legislation (Sections 141 and 142 of ESEA, Title I). This means that the system will be a better source of information which may change often and need to be updated for preparing budgets, etc. National studies, on the other hand, are by necessity less frequent, and hence are not the better strategy for producing such data.

Another difference is that national evaluations can involve data from fewer sites, since large samples are not necessary to generate national-level estimates of program effect. Consequently, State administrators of Title I must depend primarily upon the evaluation and reporting systems, which covers all Title I recipients, for identifying effective and ineffective projects.

As a result, however, of the national studies being less frequent and less universal in their sample, their scope of investigation can be more thorough than that of local evaluations. Major policy matters (such as the continuation of services to children from school year to school year or discovery of what accounts for effective projects) requiring in-depth examination and analysis in project sites are best addressed by national evaluations.

Another implication of the sampling possible in national evaluations is that acquisition of information is done more efficiently through them than through the reporting system. GAO has estimated an annual cost of local and State evaluations to be about $35 million, which, of course, far exceeds that of national evaluations.

We agree with Congress, however, in its decision to include a requirement for local evaluations, even though the effort nationwide becomes costly. It is important that educators examine their own projects regularly and, in doing so, generate data for their own decision-making. National evaluations are clearly not the preferred source of information either for local or State uses.

A final important contrast which we must acknowledge refers to matters which you note in the second part of your question: that is, due to the fact (1) that it is impossible for us to monitor closely the ways in which local evaluations are conducted, and (2) that slight compromises of rigor have been necessary in order to make the aggregation of data feasible, estimates of program effect emanating from our uniform, controlled national evaluations will contain smaller margins of error than will those from the use of the models by school districts. This is not problematic since the strategies are used to generate different types of information. It does, however, argue strongly against reliance on data from local evaluation alone. Table I summarizes the trade-offs discussed above.

Table I

Characteristics of the information from each:	Evaluation and Reporting System	National Evaluations
1. Frequency	greater	less
2. Number of sites covered	many or all	few
3. Depth of investigation	shallow (counts and outcomes)	in-depth (can answer policy issues)
4. Cost	annual cost great	annual cost much less
5. Usefulness to locals and States	useful	re: general findings only
6. Accuracy	less	more

In summary, we feel strongly that both local reporting and national evaluations are necessary to produce a body of information for use by decision-makers with each strategy contributing a type of information not possible through the other.

For local school districts which properly implement the models, the evaluation and reporting system should substantially upgrade the quality of their evaluations. Whether the uniformity of implementation across school districts and the methods for aggregating data yield accurate national-level estimates of program impact remains to be seen. Regardless of how the new system works, we believe the national-level evaluations have advantages that require their continuations.

Question 4 (b) The Title I evaluation models are based on assumptions about such things as the common scale used in the models, the soundness of the tests employed, and whether those tests are similar enough to provide data that are truly comparable. Since these assumptions are based on compromises, what, in your view, are the chances that these compromises will be acceptable for producing evaluation information useful at Federal, State and local level?

Some clarification is needed. The proposed evaluation models do not depend upon assumptions about a common scale and comparability of tests. The models are sound in their own right and should be used for local evaluations. We are, however, uncertain as to the effect of the compromises and assumptions necessary to aggregate data across them and across different tests. There has been some research, however, which we feel suggests that the assumptions are reasonable.

Specifically, data in the Anchor Test study show that children's reading scores on major standardized tests correlate highly (over .95). Of course, one must note that these data were from 135,000 fourth, fifth, and sixth graders only, and that the correlation is not a perfect 1.0. These and other data regarding the comparability of norm-referenced and criterion-referenced tests appear to us to support our approach. (We must admit that they lead others to oppose our approach, however.)

Our proposal for aggregating estimates of project effect is also supported by our firm belief that, in order to be useful to local decision-makers, evaluations at that level must use tests which correspond most closely to the objectives of the individual projects. Mandate of a single test might achieve greater statistical or analytical precision in the information produced by the system at the national level, but that would be at the clear expense of the validity and usefulness of the local evaluations to local and State officials.

We plan to further investigate the validity of the assumptions in aggregating data in the next year and will certainly modify our approach if that becomes necessary. Let me emphasize, however, that problems in the aggregation of data access tests, will not undermine the improvement in local and State evaluation practices attributable to their adherence to the techniques prescribed by the models.

Question 5. (a) What efforts are planned or underway to address alternatives to standardized norm-referenced achievement tests for uses which include program evaluation?

The full-range of alternatives for measuring children's educational performance is investigated in conjunction with each of our national evaluations, and such investigation is encouraged in our recommendations for local and State evaluation practices. Specifically, our Study of the Sustaining Effects, Evaluation of the Title I Program for Neglected and Delinquent Children, and Evaluation of Bilingual Education have incorporated instruments other than norm-referenced standardized achievement tests. The first two use tests of "functional literacy" which are felt to respond to criticisms (1) of the questionable generalizability of skills measured on standardized tests to those needed to perform basic activities in real life, (2) the irrelevance of the content of typical achievement test items to disadvantaged pupils, and (3) a resulting lack of motivation on the part of those children to respond to such tests.

The Title I study with institutionalized neglected or delinquent youth has required--in addition to the functional literacy scale mentioned above--the development of a new achievement test which can measure elementary skill levels (similar to those of pupils in grades 3-6, approximately) of teen-aged students.

This was necessitated in part by the recognition that standardized tests for the lower reading levels are comprised of items which appear silly to older students. Another motivation was the fact that such students may receive only short periods of Title I services necessitating the use of an instrument which is sensitive to small achievement gains. The item bank developed for the national study may later be available for use by Title I administrators in such institutions as they build tests to perform their own annual evaluations.

Another example is our recent evaluation in bilingual education which incorporated a variety of tests necessary to measure children's ability to understand spoken as well as written languages.

I must emphasize, however, that in each of these cases, such alternatives are incorporated in addition to--not instead of--standardized, normed achievement tests. It is certainly true that such indices for measuring children's responses to various educational experiences are necessary and informative in program evaluations; but it is also the case that standardized tests provide information that is appropriate and useful in assessing program effectiveness. Specifically, the progress of children in our programs compared to that of their peers nationwide is an important indicator and one which can only be assessed through the use of instruments with norms. Furthermore, the progress of those children in acquiring skills which are broad, transferable, and not dependent upon a specific curriculum is still an important outcome and one which specific objective-referenced or other narrowly focused instruments often cannot reflect.

We are discussing similar issues with respect to our Title I evaluation models and reporting system. As you know, the use of alternatives to standardized, normed tests is an option with that system, and many project personnel will choose that course, I am sure. What we must all recognize, however, is that if they select instruments which are very narrow in their focus (and probably yield data reflecting large gains if there is a good match between that focus and project curriculum), the relevance or "worth" of that gain will be susceptible to considerable debate. We can predict that even very large gains in some content area which is narrow and trivial would not be satisfying evidence of program effectiveness to parents, other concerned citizens, and members of Congress. This is not to suggest that such will be the case with all uses of non-standardized tests, rather to acknowledge that there exists a trade-off between an instrument's sensitivity to children's gains and the meaningfulness of those gains.

A partial solution to this might be the development of a large set of well-written items in several defined domains which, when sampled and compiled into an instrument, would give it the desirable properties of solid content coverage (of widely agreed-upon, important content areas) and greater depth of assessment. Various members of my staff have suggested this, and our current effort to solve the measurement problems in our evaluation of Title I for the neglected or delinquent youth will give us some insight into the possible success of such an endeavor. We will also gain insight from the NIE-sponsored work in this area where the Center for the Study of Evaluation (of UCLA) is investigating domains, and the Center for Reading (at the University of Illinois) is developing specific reading tests.

Let me just summarize that there certainly are causes for the use of alternative measures of achievement in education today and in program evaluation. We must be cautious, however, not to overreact to pressures by people who for one reason or another attribute all evaluation problems to the use of standardized tests.

Question 5(b). What research efforts are planned or underway which address the nature and extent of racial, sexual, and cultural biases in standardized tests?

As with the measurement problems described in the first part of this question, we typically approach questions of test bias on a case-by-case basis. We have done some work to document just what such an approach should be (which I'll describe later), but in general, our specific activities in this area focus on the testing needs of each evaluation.

Our examination of possible bias and subsequent modification and renorming of a standardized achievement test in conjunction with the evaluation of the Emergency School Aid Act have been well-documented. As you know, that work involved using a panel of members of various minority groups to peruse all test items as well as an examination of test and item statistics to determine possible bias in the instrument. We have used similar approaches in our Sustaining Effects, neglected/delinquent, bilingual, and migrant evaluations recognizing, of course, that the particular subgroup whose tests results might be unfairly influenced varies in each case.

We have also begun an evaluation of human relations activities sponsored by the Emergency School Aid Act, and investigation of bias in that study will be directed at common measures of students' affective development as well as standardized achievement tests. Our experience thus far in conducting the studies of bias in conjunction with the evaluations described above has suggested that the degree of racial or cultural bias in standard tests is probably very slight or non-existent. We will continue to explore this issue, however, as necessary to conduct sound evaluations of program effectiveness.

Since the particular group whose scores are likely to be affected by bias in instruments varies, of course, from site to site, we have felt that a useful outcome from all our experiences would be a handbook spelling out for other evaluators the process for diagnosing such problems. As you know, we hosted a conference on this issue and learned--as might be expected--that opinions vary considerably as the most appropriate solution to the problem. We are trying currently to describe and compare the various suggested solutions so as to sensitize evaluators to the issues involved. Although we feel certain at this time that most project evaluations will not be greatly affected by the use of "de-biased" instruments, we do recognize the necessity of such efforts for improving political and social acceptability of results.

Questions 6. In the past it seems OE gave little attention and priority to procedures, such as the issuance of its policy implication memorandums, which are designed to assure implementation of its evaluation study results. What is OE doing to improve the implementation of those results?

The criticism contained in question 6 is largely justified, as we have said in responding to GAO's comments on our difficulties in preparing Policy Implications Memoranda. While acknowledging that we have not been consistent or timely in preparing PIMs, however, we should note that evaluation results continue to be promptly communicated to OE program managers through interim and final reports, executive summaries and oral briefings, meetings are held to discuss the strength and implications of those findings, and recommendations on program operations and policy are made at the staff and management level and are often accepted for the program. The past should not be seen, then, as a time of little activity and low priority regarding implementation of findings and recommendations. It has been, rather, a time of considerable activity and effect, but usually--to our fault and regret--without the formal mechanism of the PIM and the clarification, authority and priority which it embodies.

There are clear signs that continuing insistence on PIM production is finally having an effect. Although only four PIMs have been produced to date, there are now six PIMs well along the route to completion, including one on Title IV of the Civil Rights Act that has been submitted to the Commissioner for approval and one based on the Compensatory Reading Study that is about to be submitted. I am thus confident that we finally have underway a consistent cycle of PIM production to support and complete our long-standing efforts with program managers to implement evaluation findings.

Sincerely,

John W. Evans

John W. Evans
Assistant Commissioner for
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REPORT TO THE CONGRESS

UNITED STATES GENERAL ACCOUNTING OFFICE

BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

Problems And Needed Improvements In Evaluating Office Of Education Programs

Office of Education
Department of Health, Education, and Welfare

The Office of Education should more strongly emphasize serving congressional needs in planning and carrying out evaluation studies, should define its program objectives more clearly, and should improve the implementation of evaluation results.

The Office of Education should assess whether State and/or local evaluation reports, under titles I and VII of the Elementary and Secondary Education Act, can realistically be improved to supply Federal, State, and local officials with the reliable program information they need for decisionmaking.

Serious questions have been raised about standardized "norm-referenced" tests, which are frequently used to measure Federal education programs' effectiveness. This report discusses some of these questions and various suggestions for alleviating problems in conducting large-scale evaluations of compensatory education and desegregation programs.

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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To the President of the Senate and the
Speaker of the House of Representatives

This report points out that the Office of Education needs to more strongly emphasize the purpose of providing information to the Congress when planning and implementing evaluation studies, more clearly define its program objectives, and improve implementation of evaluation results. The report contains recommendations to improve the usefulness of educational evaluations. Also discussed in the report are some criticisms and defenses of standardized tests and suggestions for alleviating problems in evaluating large-scale compensatory education and desegregation programs.

Our review was made because of the increasing concern shown by the Congress and various Federal agencies with evaluating the effectiveness of major Federal education programs. This concern stems from the need for objective data to be used in allocating resources and in deciding whether or not programs should be continued, modified, or discontinued.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and the Secretary of Health, Education, and Welfare.

Elmer B. Staats
Comptroller General
of the United States

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

PROBLEMS AND NEEDED IMPROVEMENTS IN EVALUATING OFFICE OF EDUCATION PROGRAMS

Office of Education
Department of Health, Education,
and Welfare

DIGEST

In recent years the Congress and various Federal agencies have become increasingly interested in evaluating the effectiveness of major Federal education programs. Such evaluations should help them decide whether programs should be continued, modified, or discontinued. (See p. 1.)

To obtain State and local agencies' views on Federal education program evaluations and related matters, GAO sent questionnaires to education agencies in all States and the District of Columbia and to a statistical sample of local school districts throughout the Nation. (See p. 11.)

This report discusses the questionnaire results, the pros and cons of standardized tests, and suggestions from testing and evaluation experts and others for alleviating problems in conducting large-scale evaluations of compensatory education and desegregation programs. (See pp. 53 and 63.)

OFFICE OF EDUCATION EVALUATION STUDIES

Office of Education evaluations are to help those making decisions about education, including the Congress. Recently, the main emphasis has been on evaluating the effectiveness of major Office of Education programs throughout the Nation.

The Office of Education's evaluation studies can better serve the Congress. Timing the studies to coincide with the legislative cycle and more frequently briefing congressional committee staff would help.

Evaluations can reach conclusive and useful findings about a program's effectiveness only if the program's objectives are defined and measurable. For example, a national evaluation of the migrant program did not adequately assess the program's effectiveness because no one had developed acceptable criteria and objectives for measuring the program's success.

Program objectives to be evaluated need to be better defined, and the ways evaluation results are used and implemented need more attention.

The Congress should recognize that the Department of Health, Education, and Welfare (HEW) is not complying, and does not intend to comply, with the legislative requirement to set forth goals and specific objectives for individual programs and projects included in its annual evaluation report to the House Committee on Education and Labor and the Senate Committee on Human Resources.

HEW feels that its authority and ability to comply with this legislative requirement are limited.

PROBLEMS WITH STATE AND LOCAL EVALUATION REPORTS

The money spent at the State and local education agency levels to evaluate selected Federal elementary and secondary education programs is large--over $42 million in fiscal year 1974.

If the reporting systems based on aggregated local agency data are to be effective, various aspects of the evaluation reports need to be improved. These include the credibility of findings and the qualification and quantification of measurement data.

The usefulness of the State and local evaluation reports also needs to be improved with respect to

--relevance of the reports to policy issues,

--completeness and comparability of the data reported, and

--report timeliness.

Valid, complete, and comparable evaluation data is important if evaluation results are to meaningfully contribute to decisions at all levels. If local and State evaluation data continues to be aggregated for use at higher levels, data collection efforts and techniques need to be standardized to provide comparable results.

Because of constraints on the Federal role in education, the Government probably will not try to provide needed valid and comparable data by dictating uniform evaluation methods and procedures to State and local education agency grantees.

In addition, questions exist about whether the models for evaluating title I (aid for disadvantaged children) will be able to provide valid and acceptable data to meet program information needs. If these issues are not resolved, GAO questions whether improvements can be made that will enable the reporting systems (based on aggregated local data) to meet program information needs at Federal, local, and/or State levels.

USES OF STANDARDIZED TESTS AND PROGRAM EVALUATION

Federal, State, and local education agencies frequently use standardized norm-referenced achievement tests to measure the effectiveness of Federal education programs. These tests measure an individual's performance against a "norm" group.

However, testing experts and educators disagree about the adequacy of these tests for their intended uses. Serious questions have been raised about the tests, and some organizations have called for a moratorium on their use and a higher priority on development and use of alternatives.

Although the tests' critics and defenders agree that certain problems exist, views differ greatly about the importance or severity of the problems, and their remedies. Defenders recognize that improvements are needed in such areas as test and test question bias; appropriate test norms; test selection, interpretation, and administration, including test uses for program evaluation; and other issues.

Some questions about the tests have great importance in determining the appropriateness, validity, and proper conduct of educational program evaluations, including those that are federally funded. Those responsible for making educational decisions should be aware of these issues when using such information.

Additional research may be needed on:

--Criterion-referenced and other tests for uses which include program evaluation, as alternatives to standardized norm-referenced achievement tests.

--How to reduce racial, sexual, and cultural biases in standardized tests.

States and especially local education agencies need to be more aware of available information intended to help them select the most appropriate tests for evaluation.

EVIDENCE OF PROGRAM EFFECTIVENESS

Local and State evaluation reports on Federal elementary and secondary education program effectiveness are intended to provide information that local, State, and Federal officials can use to make policy and program decisions. However, State and local officials see important differences in the types of evidence of program effectiveness that they and officials at other levels prefer.

Better communication is needed among the three levels on information they need to facilitate policy and program decisions. Questionnaire results raise this question: Should all three levels be served by a reporting system based on the same reports?

Although State officials view Office of Education program officials as being most impressed by standardized norm-referenced test results, and local officials view State and Office of Education officials in the same manner, State and local officials say that they are not most impressed by such results.

Local officials prefer broader, more diverse types of information on program results than just these test scores, and they are most impressed by improvements in curriculum and instructional methods and gains in the affective domain (likes, dislikes, interests. attitudes, motives, etc.). State officials are most impressed by results from criterion-referenced tests.

The widespread use of standardized norm-referenced tests to evaluate State and local programs indicates that State and local officials have more frequently based their evaluations on the kinds of results they believe would be likely to most impress higher level officials than on their own preferences.

Although HEW's comments were not responsive to certain aspects of GAO's recommendations, it agreed, at least in general, with all but one recommendation. (See pp. 21, 37, 52, and 76.)

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ABBREVIATIONS

GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
NIE	National Institute of Education
OE	Office of Education

CHAPTER 1

INTRODUCTION

ORIGIN AND DEVELOPMENT OF FEDERAL EVALUATION EFFORTS

In recent years the Congress and various Federal agencies have become increasingly concerned with evaluating the effectiveness of major Federal education programs. Because of tight budget constraints, limited financial and human resources, and the need for objective data on the effectiveness of education programs, the Congress, the Office of Management and Budget, officials of the Department of Health, Education, and Welfare (HEW), and others are requesting such data to help them allocate resources and decide whether or not programs should be continued, modified, or discontinued.

Legislative background

Legislative mandates for evaluation of education programs can be traced back at least to title I of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 241a), which required States to assure the adoption of

> "* * * effective procedures, including provision for appropriate objective measurements of educational achievement * * * for evaluating at least annually the effectiveness of the programs in meeting the special educational needs of educationally deprived children."

Congressional interest in evaluation was further reflected in the Education Amendments of 1974 (Public Law 93-380). The Office of Education states that 22 new studies and reports are required to be submitted to the Congress by the Commissioner of Education, the Assistant Secretary for Education, or the Secretary of HEW. Of the 22, 7 are evaluation studies to be conducted by the Office of Education's Office of Planning, Budgeting, and Evaluation; another is a thorough evaluation and study of Federal title I and State compensatory education programs by the National Institute of Education (NIE).

The General Education Provisions Act (20 U.S.C. 1226c) requires that HEW provide the House Committee on Education and Labor and the Senate Committee on Human Resources (previously the Senate Committee on Labor and Public Welfare) an annual evaluation report "which evaluates the effectiveness of applicable programs in achieving their legislated purposes" and recommends improvements. Any evaluation report evaluating specific programs and projects is required to

- --set forth goals and specific objectives in qualitative and quantitative terms for all programs and projects and relate those goals and objectives to program purposes;
- --report on the progress made during the previous fiscal year in achieving such goals and objectives;
- --describe the cost and benefits of each program evaluated; and
- --contain plans for implementing corrective action and legislative recommendations, where warranted.

In addition to an increasing number of congressionally mandated national studies, legislation and HEW regulations often require local and/or State evaluations of program effectiveness at least once a year.

The Education Amendments of 1972 (Public Law 92-318), established NIE as part of HEW's Education Division. The Director of NIE reports to the Secretary of HEW through the Assistant Secretary for Education, as does the Office of Education (OE). NIE is charged with improving education by, among other things, building an effective educational research and development system. Since educational research includes not only basic and applied research and surveys, but also evaluation, the law provides a new mechanism for evaluating educational programs. However, principal responsibility for evaluating OE programs remains with OE.

ADMINISTRATION OF FEDERAL EVALUATION ACTIVITIES

According to OE, the main goal of Federal educational evaluation studies is to provide information on which policy decisions about Federal education programs and OE resource allocations may be based. To achieve this goal, OE

- --conducts national evaluations of the effectiveness of Federal education programs;
- --analyzes major educational problems or issues;
- --reports annually to the Congress on the effectiveness of OE programs in meeting their legislative intent;

- --attempts to identify the program approaches that work and do not work, and determine why; and

- --attempts to identify and validate for dissemination locally initiated innovative practices and exemplary programs.

HEW's education evaluations are carried out by several entities: the Office of the Assistant Secretary for Planning and Evaluation; OE's Office of Planning, Budgeting, and Evaluation; a limited number of OE program bureaus; the National Advisory Councils; and NIE. Although the Office of the Assistant Secretary for Planning and Evaluation primarily reviews OE's evaluation activities, it also receives a small portion of education evaluation funds to conduct studies for the Secretary.

OE is among the few Federal agencies that attempt to integrate the program evaluation process with their budget and legislative cycle. OE's evaluation activities are largely centralized in the Office of Planning, Budgeting, and Evaluation. This was done to try to emphasize evaluation more strongly.

The table below lists the funds available to OE for planning and evaluation. According to OE, these sums, although substantial, represent less than three-tenths of 1 percent of OE's total annual program appropriations and must cover approximately 85 legislative programs. OE's Assistant Commissioner for Planning, Budgeting, and Evaluation estimated that from about 1971 on, approximately two-thirds of the OE planning and evaluation appropriation funds have been used for OE evaluation activities. (Chapter 4 provides funding information on State- and local-level evaluations of elementary and secondary education programs.

OE Planning and Evaluation Funds

Fiscal year	OE planning and evaluation appropriations	OE program funds used for evaluation (notes a and b)	Total
	(000 omitted)		
1968	$ 1,250	-	$ 1,250
1969	1,250	-	1,250
c/1970	9,512	$ 4,155	13,667
c/, d/1971	12,475	8,724	21,199
d/, e/1972	11,225	3,950	15,175
d/1973	10,205	9,880	20,085
d/1974	5,200	5,268	10,468
d/1975	6,858	11,043	17,901
1976	6,383	10,512	16,895

a/Includes funds authorized from Follow Through, Emergency School Assistance Act, title I of the Elementary and Secondary Education Act, Basic Opportunity Grants, Project Information Packages, and Career Education programs.

b/Does not include program funds used by State and local education agenices for evaluations under Elementary and Secondary Education Act, titles I, III, VII, and VIII.

c/Does not include $5 million appropriated for grants to States for planning and evaluation under Elementary and Secondary Education Act, title V, part C--Comprehensive Educational Planning and Evaluation.

d/Includes support for the Educational Policy Research Centers (at Stanford Research Institute and Syracuse University Research Center) for the following fiscal years: $900,000 (1971); $900,000 (1972); $950,000 (1973); and $450,000 (1974). Monitorship of the centers was transferred to the Office of the Assistant Secretary for Education in fiscal year 1974.

e/Excludes $1 million earmarked for NIE planning.

Systematic, comprehensive evaluation of Federal education programs at the Federal level dates back only to 1970. At that time the Congress increased OE evaluation funds in response to HEW's request. According to OE, such efforts were largely precluded before then by insufficient appropriated funds for evaluation and too few technically qualified evaluation staff members. Since fiscal year 1970, OE has attempted to expand and upgrade its evaluation activities and capabilities. The equivalent of about 23 professional full-time staff members are now assigned to evaluation.

The Office of Planning, Budgeting, and Evaluation has designed and begun over 100 evaluation and planning studies; instituted an annual evaluation plan highlighting yearly priorities; and implemented a process for disseminating, chiefly at the Federal level, the major results of evaluation studies.

Almost all OE evaluation and planning studies are performed under contract. OE's evaluation office issues a request for proposals after determining the study's design and the techniques to be used--for example, sample size, analysis method, and data collection method. Contractors are selected competitively. After a contract is awarded, an OE project monitor from the evaluation office monitors the contractor's performance by exercising approval over the approach to be used, making site visits, and reviewing progress reports. The project monitor also reviews and approves the draft report's technical adequacy, completeness, and responsiveness before the report is finally accepted.

OE develops and implements policy recommendations on the basis of the evaluation findings.

REQUIREMENTS FOR STATE AND LOCAL EVALUATIONS OF OE PROGRAMS

Legislation and HEW regulations often require annual evaluations of Federal programs by State and/or local education agencies. This is the case for programs and projects funded under titles I, III, and VII of the Elementary and Secondary Education Act. A brief summary of the provisions in each title follows:

--Title I provides funds through State education agencies to local education agencies serving areas with concentrations of children from low income families. The funds are intended to meet the special educational needs of educationally deprived children.

--Title III has provided funds to local education agencies, principally through State education agencies, for (1) stimulating and assisting in the development and establishment of exemplary programs to serve as models for regular school programs and (2) assisting the States in establishing and maintaining guidance, counseling, and testing programs. (The Education Amendments of 1974 consolidated the title II and most title III activities into a new title IV. Fiscal year 1976 was both the first year of funding under the new title IV and the last year of funding under title III. However, final title III projects will not run out until the end of fiscal year 1977, and requirements for State and local evaluations are in effect until that time. Title IV requires evaluation by the advisory council in each State.)

--Title VII provides OE discretionary funds for local education agencies and others to help carry out projects designed to meet the special educational needs of children who speak a language other than English and who come from low income families. Title VII is a demonstration program designed to build up the resources needed to start bilingual projects.

Local education agencies are required to evaluate their title I, III, and VII projects annually. State education agencies are also required to administer and annually evaluate their title I and III programs. However, title VII projects (bilingual education) operate under direct grants from OE; therefore, no State evaluations are required for such projects. OE is nevertheless required to consult with State education agencies before approving local education agencies' title VII grant applications and to give States the opportunity to make recommendations on the applications.

LIMITATIONS OF EDUCATIONAL EVALUATIONS

The central issue in most educational evaluation studies is whether programs such as title I of the Elementary and Secondary Education Act affect student progress. The President's Commission on School Finance was established to make recommendations to the President regarding the proper Federal role in financing elementary and secondary education. To be able to make its recommendations in the light of educational research results, the Commission asked a major research corporation to assess the available knowledge on what determines educational effectiveness. The resulting 1972 report 1/

1/Harvey A. Averch, et. al., "How Effective Is Schooling? A Critical Review And Synthesis Of Research Findings," R-956-PCSF/RC, The Rand Corporation, Mar. 1972, pp. iii-xii, 125, and 158.

states that research has found nothing that consistently and unambiguously makes a difference in student "outcomes." That is, research has not found any educational practice that offers a high probability of widespread success. OE's fiscal year 1975 annual evaluation report makes a similar statement about the attempt to identify the attributes of successful projects. A November 1976 OE-funded report, based on a study of educational innovations, found that the innovations make little difference in student achievement.

The 1972 report's findings were based on an examination of how valid the approach and results of numerous individual studies were. The report states that while some studies show a given educational practice to be effective, other similar studies find the same educational practice to be ineffective. It is unclear, the report adds, why this discrepancy exists. According to the report, four substantive problems appear in virtually every area of educational research that limit evaluation studies:

--Research data is, at best, a crude measure of what is happening. For example, student achievement is typically measured by scores on standardized achievement tests despite the many serious problems involved in interpreting such scores. (See chs. 5 and 6.)

--Educational outcomes are almost exclusively measured according to cognitive achievement, often leading to sparse and inconclusive results that provide little guidance on what practices are effective.

--There is almost no examination of the cost implications of research results, which makes it very difficult to translate research/evaluation results into policy-relevant statements.

--Few studies adequately monitor the relationship between what actually goes on in the classroom and student achievement, so that data may be affected by circumstances unrecognized in analysis.

Because of the problems above, according to the report researchers are confronted by the virtually impossible task of measuring those aspects of education they wish to study. That is, it is impossible for current research to reach definitive conclusions about educational outcomes because it cannot measure most of them well.

Other studies point out that numerous poorly designed and implemented evaluations result in very questionable or invalid data on which to base decisions about policy or programs.

A 1975 study, 1/ which reviewed the major title I evaluation efforts from 1965 through 1972, discusses some limitations in educational evaluations. The study traces the accepted belief in the necessity to evaluate education programs to title I of the 1965 act. This legislation established local reporting on projects in the hope that timely and objective information about the results of title I projects could reform the local administration of education and the methods of educating poor children. It was also hoped that systematic evaluation could make Federal management of education programs more efficient. According to the study, those pursuing educational reform saw evaluation as central to achieving it and assumed that reporting requirements would generate valuable information which would be used rationally in contributing to policy and program decisions.

The study concluded that after 7 years, more than $52 million of expenditure on evaluations, and creating a number of alternative evaluation models, evaluation had failed to meet the expectations of those urging reform or even to serve the self-interest of Federal program managers. Regarding this conclusion, the study stated:

> "There are numerous reasons why efforts to evaluate Title I failed * * * The central cause is that school districts had no incentive to collect or report output data, and federal officials lacked the political muscle to enforce evaluation guidelines or to require cooperation with other federal evaluation efforts * * *."

The study added:

--Those interested in reform efforts failed to take into account the difficulty of evaluating the process of schooling in general and title I in particular.

1/Milbrey Wallin McLaughlin, "Evaluation and Reform," a Rand Educational Policy Study, Ballinger Publishing Company, Cambridge, Mass., 1975, pp. vii-ix and 117-120.

--Legislatively mandated evaluation, intended to make school administrators accountable, has led to local evaluation that is, in the view of many observers, little more than an annual ritualistic defense of program activities. In addition, the Federal evaluation efforts have not contributed to the formulation of short-run management strategies or long-range planning. Evaluations based on an "impact cost-benefit" model have been used selectively to lend an appearance of rationality to decisions that are essentially political.

--Contrary to the expectations of those interested in reform efforts, neither Federal decisionmakers nor local school personnel showed much ability or interest in using evaluations to formulate title I policy or practice.

--Local perceptions of Federal initiatives and commitments as inherently unstable, combined with a basic local defensiveness about achievement measures, will probably continue to frustrate Federal attempts to secure objective, reliable information on program results.

--The highly political way that title I evaluation has been conducted, including use of its results, has weakened the credibility of evaluation as a policy instrument, in the opinion of many program personnel.

--A realistic and useful evaluation policy should acknowledge the inherent constraints that the policy system and the behavior of bureaucracies place upon evaluation.

In addition, the study stated:

"The history of Title I evaluation also suggests a number of implications about the conduct and use of evaluation in a multi-level government structure * * * In a federal system of government, and especially in education, the balance of power resides at the bottom, with special interest groups * * * Thus a federal evaluation policy that conflicts in fundamental ways with local priorities is unlikely to succeed * * * Federal evaluators, then, are faced with a specifically political dilemma generated by their inability to insist upon accurate information on school effects and program

> impact. And the existence of powerful social sanctions against a strong federal data requirement means that these barriers to the implementation of federal evaluation policy will remain."

OE's Assistant Commissioner for Planning, Budgeting, and Evaluation said that he agrees with this historical analysis. He believes that the evaluation approach that OE's evaluation office follows takes these problems into account because it is based not on school district data but on contractor data collected nationally.

CHAPTER 2

SCOPE AND METHOD OF REVIEW

Our objectives were to review the usefulness and limitations of federally supported education evaluations--focusing mostly on elementary and secondary education programs--and to solicit suggestions on needed program evaluation improvements, including needed research and development.

We reviewed OE's evaluation activities--principally carried out through the Office of Planning, Budgeting, and Evaluation--and related NIE activities. We also reviewed legislation, policies, procedures, and various Federal, State, and local education agency program evaluation reports relating to the Elementary and Secondary Education Act, titles I, III, and VII.

We interviewed officials from the Office of the Secretary of HEW, the Office of the Assistant Secretary for Education, the National Center for Education Statistics, OE, NIE, and the Office of Management and Budget. In addition, we interviewed the staff members of various congressional committees and officials from 11 education research organizations, including 4 publishers of commercial tests and 6 research/evaluation organizations. We also interviewed officials from two national interest groups concerned with education, and attended conferences of educators and measurement and evaluation experts which were held to improve student assessment or educational program evaluation.

To obtain State and local education agencies' views on Federal education program evaluations and related matters, we sent questionnaires to education agencies in all States and the District of Columbia, and to a statistical sample of local school districts throughout the Nation. The two sets of questionnaires were sent in April 1975 and were returned by June 1975.

The District of Columbia and 49 States responded to our State-level questionnaire. (To simplify questionnaire results in this report, we consider the District of Columbia to be a State.) Appendix I compiles the responses on the State education agency questionnaire. Respondents to section A of the questionnaire were almost always officials responsible for statewide assessment, accountability, and/or testing activities. Respondents to sections B and C were nearly always officials responsible for titles I and III programs, respectively.

Our questionnaire sample for local school districts was largely the same as a national sample used by the Office of Education in 1973. Neither sample included school districts having fewer than 300 pupils; both were stratified according to enrollment as follows: 125,000 pupils or more; 35,000 to 124,999 pupils; 9,000 to 34,999 pupils; 3,000 to 8,999 pupils; and 300 to 2,999 pupils.

Nineteen school districts compose the first group--the largest school districts--and all were included in the sample. An independent random sample of 813 school districts was drawn from the remaining groups. We received responses from 710 (85 percent) of the 832 school districts included in the sample.

As a result of the high response rate, the attitudes and opinions expressed in response to our local school district questionnaire are representative of the entire universe of 11,666 such districts in the Nation having 300 or more pupils. However, we projected the responses to a total of 8,936 local education agencies because this method, based on the weighting and the response rates across the various strata in our sample, allows us to obtain the most accurate percentages on the answers given.

Local education agency questionnaire results appear in appendix II. The numbers shown there represent the number of local school districts in the Nation to which our local questionnaire sample responses have been projected. Most local education agency respondents to section A of the questionnaire were directors for testing. Most respondents for sections B, C, and D were directors for titles I, III, and VII projects, respectively. However, in some cases superintendents responded to the questionnaire.

Our questionnaires focused on program evaluations of titles I, III, and VII of the Elementary and Secondary Education Act for a number of reasons. The largest Federal emphasis in education has been placed on the attempt to deal with various inequalities in educational opportunity. Programs of this kind have attempted to equalize educational opportunity for groups and individuals who are at a disadvantage (titles I and VII) and to improve the quality and relevance of American education through research and demonstration and dissemination of results (title III). Appropriations for the programs under these three titles are substantial. For fiscal year 1975 they were $2.2 billion, which represented about one-half of all Federal elementary and secondary education program dollars. In addition, Federal legislation and HEW regulations require national, State, and local evaluations for titles I and III, and national and local evaluations for title VII.

To supplement information obtained from the questionnaires, we interviewed education agency officials from five States, the District of Columbia, and 10 local school districts.

CHAPTER 3

OPPORTUNITIES TO IMPROVE OE'S EVALUATION STUDIES

Evidence we gathered indicates that opportunities exist for OE's evaluation studies to better serve the Congress. Specifically, this includes timing the studies better and briefing congressional committee staff more frequently.

OE also needs to better define the program objectives to be evaluated and improve the use of evaluation results.

CONGRESSIONAL NEEDS SHOULD BE TAKEN MORE INTO ACCOUNT

According to OE, its evaluations are intended primarily to assist those involved in making educational decisions. This includes the Congress. In recent years the main emphasis has been on evaluating the national impact or effectiveness of major OE programs.

Decisions on education programs are made at various levels--in the Congress, OE, State education agencies, and local school districts. Decisionmakers at different levels sometimes need different information. For evaluation studies to be most useful to them, the views of those who are to use the results should be taken into account in evaluation planning and design. This increases the chance that their information needs will be adequately fulfilled and that resultant decisions will be well defined. It should also increase the chance that evaluation results will be effectively communicated to those intended to use them.

One such user to which OE should give greater attention in providing program evaluation information is the Congress. To obtain information on how useful OE evaluation studies are to the Congress and how much congressional views are taken into account in those studies, we contacted four key congressional committee staff members responsible for education matters, including the Majority and Minority Counsels for the Subcommittee on Elementary, Secondary, and Vocational Education, House Committee on Education and Labor; the Minority Counsel for the Subcommittee on Education, Senate Committee on Human Resources; and the Chief Counsel for the Senate Appropriations Committee. Two persons interviewed believed that OE does not obtain enough congressional input in designing its evaluation studies.

One of the four staff members stated that OE evaluation studies are generally useful and reasonably good. The other three stated that the studies often have been completely ineffective or have had little impact on legislation. Their most frequently cited reasons were that

- --OE studies are not timed to coincide with the legislative cycle;
- --OE efforts to interpret data and highlight important findings are insufficient; and
- --OE briefings for congressional committee staff are not frequent enough.

OE's Assistant Commissioner for Planning, Budgeting, and Evaluation agreed with each of these statements and said that the evaluation office has not been sufficiently sensitive and responsive to congressional needs. He noted that the long leadtime necessary to plan and implement studies contributes to this problem.

OE's Assistant Commissioner for the Office of Legislation said that he considers the poor timing of evaluation studies to be a major factor inhibiting their impact on legislation. He stated that OE's evaluation office has not made the effort necessary to assure that evaluation results are arrived at and communicated soon enough to be considered in developing legislative proposals.

Commenting on our report, HEW stated that it does not concur with one of the three reasons cited above for the limited impact of its studies. HEW believes that its procedure for interpreting and summarizing evaluation study results is not deficient. Brief summaries of each evaulation study are sent to all members of the cognizant House and Senate authorizing and appropriation committees and their staffs, as well as to appropriate HEW Education Division staff and others.

PROGRAM OBJECTIVES NEED TO BE DEFINED

Evaluations can reach conclusive and useful findings about a program's effectveness only if the program's objectives are defined and measurable. However, our review of selected evaluations and reports, as well as discussions with OE and non-OE experts, showed that one major problem in assessing education programs is the lack of sufficiently defined objectives.

For example, a national evaluation of the migrant program under title I of the Elementary and Secondary Education Act had not adequately assessed the program's effectiveness, an OE migrant program official said, because no one had developed acceptable criteria and objectives for measuring the program's success.

In addition, officials from OE's evaluation office stated that the purpose and objectives of title I itself have not been specified clearly. They said that this has made it difficult to evaluate the effectiveness of the title I program.

Other educational researchers have pointed out that it is difficult to establish criteria for Federal programs designed to respond to multiple needs, such as titles I and III of the Elementary and Secondary Education Act. They have stated that when the purposes of a program such as title I or III are ambiguous, various criteria are applied in assessing the program which leads to noncomparable evaluation results.

Likewise, officials representing a major test publisher said that the objectives of compensatory education programs should be clarified.

According to some educational researchers and contractors who compete for OE evaluation contracts, OE studies do not always define clearly the criteria and major questions that should be addressed. For example, a researcher who frequently prepares OE policy studies said that OE evaluation studies do not help in formulating policy because they are not set up to answer the major short-term or long-term questions.

Other educational experts stated that lacking measurable and sufficiently defined objectives often led to evaluation studies that addressed unanswerable questions and produced inconclusive results. They added that the language used in legislation, regulations, policy manuals, plans, and budgets is generally ambiguous and fails to precisely define program objectives and make the evaluation useful.

As mentioned in chapter 1, legislation requires that HEW provide the congressional committees having responsibility for education with an annual report evaluating program effectiveness in achieving legislative purposes. The report is required to set forth goals and specific objectives in qualitative and quantitative terms for all programs and projects assisted which are evaluated and relate those goals and objectives to the program's purposes.

Our review of the annual evaluation report on OE programs for fiscal year 1975 showed that most of its statements of program goals and objectives merely restated the legislative purposes or general goals, and did not set forth specific objectives. Quantitative objectives, even in the broadest sense, were established for very few programs.

OE's Assistant Commissioner for Planning, Budgeting, and Evaluation agreed with our observations and said that OE has seldom established specific objectives. He stated that this should be corrected, but that OE sometimes faces opposition from the Congress and others when it specifies objectives. We agree that the Congress has major responsiblity for specifying program objectives. In our view, however, the legislative requirement and OE's limited responsiveness to it, as well as the need for providing a clear basis for program evaluation, dictate that OE make a better effort to set forth specific qualitative and quantitative program objectives for congressional consideration.

USE OF EVALUATION RESULTS NEEDS MORE ATTENTION

In 1972, OE's Office of Planning, Budgeting, and Evaluation instituted a procedure which entails drafting and implementing a "policy implication memorandum" to increase the use of the evaluation findings with which OE concurs in policy and program decisions. However, the procedure has not been used to its potential.

The memorandum procedure was developed to translate the findings of evaluation studies into a list of "action items" for program management. It represents an attempt to make sure that study results receive proper attention from OE and department decisionmakers. For instance, the Commissioner of Education may use the memorandum as a base for policy decisions. He may selectively direct actions to be taken, the office responsible for implementing them, and their due dates.

According to OE's Assistant Commissioner for Planning, Budgeting, and Evaluation, the procedure is one of the most important parts of the whole evaluation process, which encompasses evaluation planning through implementation of results. He believes it is superior to other implementation methods because the implications of evaluation results which OE accepts for implementation, including related followup requirements, are explicitly set forth in areas such as basic policy, budgeting, staffing, and program regulations. Also, the Assistant Commissioner believes, decisions are more likely to be made on action items under such a procedure.

An OE evaluation official said that policy memorandums were to be written after the completion of each evaluation study in which important findings were produced. From March 1972 to March 1974, OE's evaluation unit completed 32 studies, costing a total of about $8.2 million. The Secretary's evaluation office, using education evaluation funds of about $3.5 million, completed 18 studies during a similar period.

Although OE considers the policy implication memorandum procedure a key to assuring the use of study results, it was followed on only two evaluation studies completed during this period. 1/ We reviewed its use in both instances--the studies cost $120,000 and $772,000--to ascertain how it affected policy and program changes.

The first policy memorandum was dated December 26, 1972; the other August 19, 1974. Nine months elapsed between the first study's completion date and the preparation of the policy memorandum, and 10 months elapsed for the second study.

Several sources doubted the impact of the first study and memorandum. A program official affected by the study, relating to title I of the Elementary and Secondary Education Act, said that there was no evidence showing that memorandum recommendations were being taken seriously or were influential in causing program change. In addition, OE program officials said that they were pursuing some of the recommendations contained in the memorandum prior to availability of the results of the evaluation study. Also, OE's Assistant Commissioner for the Office of Legislation stated that neither the policy memoradum nor the study has had much influence on the process of developing new legislation for title I. He explained that one reason for their lack of impact was the Administration's emphasis on educational revenue-sharing at the time of the study's publication. This emphasis reduced interest in amending existing legislation that might have been substantially

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1/In November 1976, OE's Assistant Commissioner for Planning, Budgeting, and Evaluation stated that a third memorandum had been written.

eliminated and replaced if the educational revenue-sharing legislation had been enacted.

The evaluation office official who wrote the memorandum said in November 1976 that the evaluation office was not following up on all memorandum recommendations despite the fact that some were still open issues. He agreed that better followup of such open issues should be a part of the policy implication memorandum system.

An OE official involved in the evaluation study said that although very few of its recommendations were acted upon, it compiled evidence to support certain conclusions for the first time.

A program official stated that if program officials had been consulted about the subject matter, content, and design of the study, they would have been in a better position to use the study's results. Evaluation office officials disagreed with this view and stated that they extensively involve program officials in designing evaluation studies.

The second policy memorandum contained only one major recommendation which required further action. The recommendation was implemented, and substantially changed program emphasis. The OE project monitor for this study said that a policy implication memorandum was written for it because the procedure was given high priority at the time.

Regarding other evaluation studies for which no policy memorandums were written, OE project monitors gave these explanations:

--The priority placed on writing the memorandums was not high enough.

--Evaluation studies had overlapping cycles; therefore, before one was completed another could start, detracting from full appreciation of the earlier one.

--Delays in receiving study reports could have affected writing the memorandums.

An OE official commented on this situation, stating that because policy memorandums are not being written, meaningful study conclusions fail to reach policy planners and program administrators who have a voice in the legislative process. He felt that the procedure is needed to call attention to the significant recommendations in each study.

In our opinion, delays of nearly 1 year before the two policy memorandums were written and approved and the general lack of such memorandums clearly point to the need for more OE emphasis on assuring increased use of the evaluation findings with which OE concurs. This includes giving a higher priority to policy implication memorandums or some other procedure for achieving this purpose. OE's Assistant Commissioner for Planning, Budgeting, and Evaluation agreed that OE has not successfully carried out the policy implication memorandum system. Although he believes the memorandums are of central importance, other priority matters have preempted staff time.

CONCLUSIONS

Opportunities exist for OE's evaluation studies to better serve the Congress. These include better timing of the studies and more frequently briefing congressional committee staff.

There is a need to better define the program objectives to be evaluated. The use and implementation of evaluation results also need more attention.

RECOMMENDATIONS TO THE SECRETARY OF HEW

We recommend that the Secretary of HEW direct OE to:

--More strongly emphasize the purpose of providing information to the Congress when planning, implementing, and reporting on evaluation studies. In particular, more attention should be given to timing the studies so that they more clearly coincide with the legislative cycle and briefing congressional committee staff more frequently.

--Take steps to comply with the General Education Provisions Act (20 U.S.C. 1226c) requirement that, in the annual evaluation report to the House Committee on Education and Labor and the Senate Committee on Human Resources, HEW set forth goals and specific objectives in qualitative and quantitative terms for all programs which are evaluated. OE should indicate in the evaluation report that it is setting forth specific objectives tentatively in response to the congressional requirement and as a basis for future discussion and agreement with the committees on program evaluation matters. These matters should include the acceptable evaluation data needed by congressional decisionmakers and the measures to be used. If HEW still does not intend to comply with this requirement, it should propose legislative changes to the Congress to avoid continued agency noncompliance. In the meantime OE should initiate dialogues with the appropriate House and Senate committees to seek understanding and agreement on the specific program objectives to be used for evaluations as well as acceptable evaluation data and measures for each program to be evaluated.

--Improve the implementation of evaluation results by giving greater attention and priority to procedures such as the issuance of policy implication memorandums designed to assure implementation of those results.

AGENCY COMMENTS AND OUR EVALUATION

HEW commented on matters discussed in this report in a letter dated June 15, 1976. (See app. III.)

HEW agreed with our recommendation that OE should more strongly emphasize meeting congressional information needs by timing the studies to better coincide with the legislative cycle and briefing congressional staff more frequently. HEW stated that it has initiated a series of reviews of its studies, focusing on predicted production dates for findings and recommendations in relation to critical dates for legislative input. HEW also stated that the need for congressional committe staff briefings has not been given proper attention but that it has recently decided to institute such briefings on all major evaluation studies and will initiate this procedure in the coming weeks.

Regarding our recommendation that OE should improve the implementation of its evaluation results, HEW agreed and stated that the policy implications memorandum procedure, which is an invention of OE's evaluation office, has not been used nearly as extensively as it should have been. HEW said that efforts are currently underway to expand the use of these memorandums and that agency officials are now conducting periodic reviews of the schedule for producing the memorandums and emphasizing their high priority.

Our draft report proposed that OE better define the program objectives to be evaluated as required by the General Education Provisions Act (20 U.S.C. 1226c). This includes translating the legislative purposes of individual programs evaluated into specific qualitative and quantitative program objectives, and clearly stating these objectives, and the progress made toward achieving them, in the annual evaluation report.

HEW disagreed with this proposal because it believes there are limits on OE's "authority and ability" to increase the clarity and specificity of its program objectives. HEW comments, however, ignored the fact that the General Education Provisions Act requires the agency to set forth such objectives for individual programs included in its annual evaluation report to the House Committee on Education and Labor and the Senate Committee on Human Resources.

HEW said that in most cases legislation fails to state a program's objectives with sufficient clarity for evaluation. It appears that the Congress has also recognized that program legislation does not provide sufficiently clear and specific objectives for evaluation; therefore, in the General Education Provisions Act it has required HEW to set these forth in a report to the appropriate congressional committees. HEW comments did not respond to its noncompliance with this requirement, although OE's Assistant Commissioner for Planning, Budgeting, and Evaluation agreed with our finding on this matter. (See p. 17.)

HEW stated that it "proceeds at considerable peril in trying to further specify legislation" and that

> "* * * in many cases it has been the Congress' specific intention to avoid specification of program objectives and leave such judgments and decisions up to State and local officials."

However, in conducting national program evaluations the Office of Education is often implicitly establishing and using specific program objectives; for example, standardized tests, frequently used in these evaluations, are based on specific instructional objectives. We believe there is an important distinction between specific program objectives explicitly set forth for Federal evaluations and those which would be established to dictate to State and local education agencies specifically how to design and run their programs which use Federal funds. If OE cannot explicitly set forth specific program objectives it would use for Federal evaluation purposes, then we believe it is inconsistent to conduct national program evaluations which contain such objectives implicitly.

We agree with HEW that there is political opposition, but we believe such opposition is really directed toward Federal infringement on State and local education agency perogatives. Such opposition effectively restrains the Federal agency from trying to dictate State and local program goals, specific objectives, approaches, etcetera. In our view, HEW should comply with the requirement, but in doing so it should clearly indicate in the evaluation report that the specific objectives are tentative, are being set forth in response to the legislative requirement, and are intended only for congressional scrutiny and as a basis for mutual discussion and agreement on program evaluation matters, including the acceptable evaluation data needed by congressional decisionmakers.

In its general comments on our report HEW stated its belief that there is growing professional opinion that OE's studies have, over the past 10 years, been responsible for many major changes in existing legislation. Also, in HEW's view the assumption that there are certain decisionmakers, and that effective evaluations provides timely data to them, is increasingly being questioned. Instead HEW believes that effective evaluations affect the broad political climate within which particular decisions are made.

Obviously, HEW believes that OE studies are affecting legislative decisions. However, as discussed in our report, three of the four key congressional committee staff members interviewed, who are responsible for education matters, said that the studies often have been completely ineffective or have had little impact on legislation. Therefore, we continue to believe that the primary purpose of these evaluations should be to provide useful information to decisionmakers.

RECOMMENDATION TO THE CONGRESS

The Congress should recognize that HEW is not in compliance and does not intend to comply with the General Education Provisions Act requirement (20 U.S.C. 1226c) as noted above. HEW feels that its authority and ability to comply with this legislative requirement are limited. The Chairmen of the House Committee on Education and Labor and the Senate Committee on Human Resources should discuss this matter further with agency officials to seek a common understanding with them on the process or approach to be used for (1) clarifying program objectives for evaluation and (2) reaching agreement on acceptable evaluation measures and data for each program to be evaluated.

CHAPTER 4

PROBLEMS WITH STATE AND LOCAL EVALUATION REPORTS

A large amount is spent to evaluate State education agency title I and III, and local education agency title I, III, and VII elementary and secondary education programs. Agency officials at these levels, responding to our questionnaires, indicated a need to improve program evaluation reports, including these important areas for determining program effectiveness: the credibility of findings and the qualification and quantification of measurement data.

Other areas needing attention and improvement to make the State and local evaluation reports more useful include

--the relevance of the reports to policy issues,

--the completeness and comparability of the data reported, and

--report timeliness.

The significance of these problems and other factors raise a question about whether the present reporting systems based on aggregated local data can be improved so that they meet program information needs at Federal, local, and/or State levels.

STATE AND LOCAL EVALUATION EXPENDITURES

In addition to the funds authorized for program evaluation at the Federal level (see ch. 1), the Elementary and Secondary Education Act requires annual State and local education agency evaluations of title I and III programs, and local evaluations for title VII. The following tables show--on the basis of State and local agency responses to our questionnaire--estimates of the evaluation funds expended by State and local education agencies for the programs during fiscal year 1974.

Estimated State-level Expenditures for Evaluating Selected Elementary and Secondary Education Programs Fiscal Year 1974 (note a)

	Title I	Title III
Total State-level program expenditures reported for evaluation	$ 2,066,020	$1,723,805
Average State program grant	24,520,132	2,127,455
Average expenditures on evaluation per State	43,958	39,177
Average percent of grant spent for evaluation (note b)	1.2%	5.4%

a/All amounts are based on unverified questionnaire responses from 47 States for title I and 44 States for title III.

b/The percentages shown are based on the averages of the percent of grant funds reportedly spent for evaluation by the States. However--overall, two-tenths of one percent of title I and 1.8 percent of title III funds were reportedly spent for evaluation. The differences between these percentages and those shown are because larger percentages of the smaller grants were generally used for evaluation.

Estimated Local-level Expenditures for Evaluating Selected Elementary and Secondary Education Programs Fiscal Year 1974 (note a)

	Title I	Title III	Title VII
Local project expenditures reported for evaluation	$31,790,960	$5,089,344	$1,574,320
Average project grant per local district grantee	161,417	50,240	164,705
Average evaluation expenditures	3,860	2,101	4,537
Average percent of grant spent for evaluation (note b)	6.4%	5.0%	3.1%

a/All amounts are based on unverified questionnaire responses from local school district respondents representing 8,236 title I, 2,422 title III, and 347 title VII projects.

b/The percentages shown are based on the averages of the percent of grant funds reportedly spent for evaluation by the local projects. However--overall, 2.4, 4.2, and 2.8 percent of title I, III, and VII funds, respectively, were reportedly spent for evaluation. The differences between these percentages and those shown above are because larger percentages of the smaller grants were generally used for evaluation.

OE officials stated that OE does not collect State and local education agency data on evaluation expenditures.

STATE AND LOCAL EVALUATION REPORTS NEED IMPROVEMENT

Our questionnaires asked State and local officials connected with administering title I, III, and VII programs under the Elementary and Secondary Education Act to rate the adequacy of these aspects of the State and local evaluation reports: credibility of findings, presentation of required management information needs, qualification of findings, qualification and quantification of measurement data, and focus and scope. In our opinion, the adequacy of these aspects is likely to greatly influence how much the reports satisfy the policy, management, and program information needs of State and local officials.

In most cases, more respondents rated the various aspects of the evaluation reports in the "adequate or better" categories than in the "less than adequate" categories. However, in each aspect, many respondents to the questionnaires indicated that State and local evaluation reports were inadequate; most of these ratings were in the "marginal" category. In addition substantial numbers of State and local officials rated State and local evaluation reports to be less than adequate in these important areas for determining program effectiveness: the credibility of findings and the qualification and quantification of measurement data. In our opinion, such large numbers of less-than-adequate ratings indicate a serious need for improvement in the reports.

The following table summarizes the respondents' less-than-adequate ratings of State evaluation reports.

State Evaluation Reports: Summary of Respondents' Less-Than-Adequate Ratings (note a)

	State program officials of title:		Local project officials of title:		
	(percent)				
	I	III	I	III	VII
Credibility of findings	59	40	45	36	61
Presentation of required management information needs	59	40	48	38	59
Qualification of findings	47	47	50	39	69
Qualification and quantification of measurement data	57	55	49	42	51
Focus and scope	42	43	38	33	60

a/Percentages for State program officials are in all cases based on questionnaire responses from 48 or 49 States for title I and between 45 and 47 States for title III. Percentages for local project officials are based on sample responses and in all cases represent more than 8,300 title I projects, more than 2,350 title III projects, and about 300 title VII projects. See app. I, questions 9-13 and 20-24, and app. II, questions 9-13, 21-25, and 33-37.

The following table summarizes the questionnaire respondents' less-than-adequate ratings of local evaluation reports:

Local Evaluation Reports: Summary of Respondents' Less-Than-Adequate Ratings (note a)

	State program officials of title:		Local project officials of title:		
	(percent)				
	I	III	I	III	VII
Credibility of findings	67	60	38	31	47
Presentation of required management information needs	71	56	39	31	42
Qualification of findings	69	60	41	34	39
Qualification and quantification of measurement data	57	58	44	40	41
Focus and scope	50	40	30	25	43

a/Percentages for State program officials are in all cases based on questionnaire responses from 48 or 49 States for title I and 48 States for title III. Percentages for local project officials are based on questionnaire sample responses and in all cases represent more than 8,500 title I projects, more than 2,400 title III projects, and about 350 title VII projects. See app. I, questions 9-13 and 20-24, and app. II, questions 9-13, 21-25, and 33-37.

Credibility of findings

The questionnaire defined this aspect as the degree of confidence expressed in the findings through statements about statistical certainty, soundness of method, evidence of replication, consensual agreements, similar experiences, supporting expert judgment and opinions, and reasonableness of assumptions.

As the table on page 27 shows, between 36 and 61 percent of State and local respondents from the various programs rated the credibility of findings in their program's State evaluation reports to be less than adequate.

As the table above shows, the percentage of State and local respondents from the various programs that rated local evaluation reports to be less than adequate in this aspect ranged from 31 to 67 percent.

Presentation of required management information needs

The questionnaire defined this category as the extent to which the reports are informative to those who evaluate and update current policies and transfer policy decisions into plans, budgets, curriculum or program implementation, operational oversights, resource allocations, forecasts, status assessments and reports, educational accountability, costs, benefits, and efficiency assessments.

The percentage of State and local respondents finding this aspect of their program's State evaluation reports to be less than adequate ranged from 38 to 59 percent. Similarly, for local evaluation reports, the range was from 31 to 71 percent.

Qualification of findings

The questionnaire defined this aspect as the extent to which the reports properly qualify the findings and assumptions and identify those conditions and situations to which the findings are not applicable.

The percentage of State and local respondents rating this aspect of their program's State evaluation reports to be less than adequate ranged from 39 to 69 percent; for local evaluation reports, the percentage ranged from 34 to 69 percent.

Qualification and quantification of measurement data

The questionnaire defined this category as the extent to which the evaluation assessments can be qualified and quantified into measurable attributes and parameters that address the problem in measurable, operational, or concrete terms.

The percentage of State and local respondents rating this aspect of their program's State evaluation reports to be less than adequate ranged from 42 to 57 percent; for local evaluation reports, the range was from 40 to 58 percent.

Focus and scope

The questionnaire defined focus and scope as the adequacy with which the reports covered essential and related material and the appropriateness of the emphasis and treatment given to the relevant topics and details and high and lower priority information.

The percentages of State and local respondents rating this aspect of their program's State evaluation reports to be less than adequate ranged from 33 to 60 percent; for local evaluation reports, the range was from 25 to 50 percent.

Other questionnaire results

Only 61 percent of State title I officials and 62 percent of State title III officials said that local evaluation reports "generally" or "very often" adequately show evidence of qualifiable or measurable student benefits; and only 64 percent of State title I officials and 50 percent of State title III officials said that State evaluation reports are generally or very often adequate in this respect.

Although over 75 percent of the State respondents said they use local and State evaluation results for policy, programmatic, or management decisions, the only data contained in State and local reports which was frequently found adequate by State officials was

--the number of children in the program and

--the per-pupil expenditures.

Most local school district respondents stated that their reports are generally or more often than generally adequate in providing essential information on the

--number of children in the program,

--per-pupil expenditures for each program,

--evidence of quantifiable and measurable achievement, and

--evidence of quantifiable or measurable pupil benefits.

OTHER PROBLEMS

To be useful in making decisions at the Federal level, State and local evaluation reports should be timely, complete, comparable, and relevant to policy issues. Among the Elementary and Secondary Education Act State and local evaluation reports submitted to OE that we reviewed, most did not meet any of these criteria.

Three factors need to be considered:

- --The significance of these and other problems discussed in this chapter.
- --Constraints on the Federal role in education as discussed in chapter 1. (See pp. 8 to 10.)
- --Questions about whether ongoing efforts to resolve these problems with evaluation models for title I will be effective.

If the questions about the models are not resolved, the feasibility of producing improvements that will enable the present reporting systems based on aggregated local data to provide the information needed is questionable.

Usefulness and relevance to policy issues

Evaluation reports have the best chance of affecting policy decisions if they are designed to directly address policy issues. The reports should, for example, indicate programs' or projects' successes and failures.

In relation to this, OE officials generally said that State and local evaluation reports were rarely used to support operational or policy changes. State compensatory education program officials made similar statements, saying that State and local evaluations are of limited usefulness to those making decisions. In addition, OE's Assistant Commissioner for Planning, Budgeting, and Evaluation stated that there is no question that the State and local evaluation reports are not useful.

Similarly, two OE-contracted research studies question the usefulness of State and local evaluation reports:

- --A study analyzed the policy-relevance rating of title I State evaluation reports for the 5 fiscal years 1969-73. Study results revealed serious problems concerning the validity of data reported by most States, precluding any meaningful interpretation of data. The study noted that the majority of the reports examined were seriously deficient in reporting policy-relevant information.

--A 1974 study of a nationwide sample of title VII evaluations concluded that no strong relationship could be established between the content or quality of evaluation reports and funding levels awarded to projects. It also concluded that none of the evaluations presented data which would indicate project failure, noting that such information is essential if a report is to be useful to decisionmakers. The study also noted that over half the evaluations it reviewed were of limited or no use for making judgments about project effectiveness.

Our review of selected evaluation reports and discussions with OE program officials generally confirmed that the State and local education agency reports, because of problems cited in this chapter, have little effect on Federal-level decisions.

Complete and comparable data in reports

Evaluation of Federal programs at the local level should produce reports containing valid, complete, and comparable results if data from each report is to be aggregated to provide Federal policymakers and program administrators with a good perspective on how well the program as a whole has worked and which approaches have produced the best results.

Response to congressional requirement

The Congress has recognized the need for OE to make State and local education agency evaluation reports more usable. The Education Amendments of 1974 (Public Law 93-380) directed the Commissioner of Education to carry out certain evaluation activities for programs authorized by title I of the Elementary and Secondary Education Act. Section 151 of the act directs the Commissioner to

--provide for independent evaluations which describe and measure impact of programs and projects,

--develop and publish standards for evaluation of program or project effectiveness,

--provide models for evaluation to State education agencies,

--provide such technical and other assistance as may be necessary,

--specify objective criteria which shall be utilized in the evaluation of all programs, and

--outline techniques and methodology for producing data which is comparable on a statewide and nationwide basis.

OE has begun activities to address each of these requirements, and evaluation models are being developed and refined. OE plans to require State and local use of the models (or use of alternatives that the Commissioner certifies will generate compatible evaluation data). However, OE Planning and Evaluation Office officials have stated that they do not believe that evaluation needs at the local, State, and Federal levels can all be met by the same approach. In addition, these officials, including OE's Assistant Commissioner for Planning, Budgeting, and Evaluation told us that although the models will make aggregation of locally collected data theoretically possible, accomplishing successful implementation for 14,000 school districts is doubtful, or at least questionable. They noted that the problems that need to be overcome are methodological, fiscal, and political. For example, some State and local officials do not want comparisons of educational results.

An OE evaluation official said further that the models are based on assumptions about such things as the common metric (scale) used, the soundness of the tests employed, and whether those tests are similar enough to provide data that is truly comparable; these assumptions represent compromises, and whether they will satisfy everybody is unclear. He stated that because of its technical nature the information based on the models may be provided to those who are responsible for decisions without an explanation of the assumptions involved. We believe that such information, when provided to the Congress and other users, should set forth these assumptions as clearly as possible.

OE's evaluation office is offering these types of technical assistance on title I: written handbooks on evaluation topics, such as the models; technical assistance workshops to train State administrators and evaluators in using the models and to prepare them to train local school district personnel; and consulting services to States to help them use the models. Technical assistance centers have been established throughout the country under OE contracts to provide these services. According to OE, such services might include writing computer programs, conducting workshops to train local personnel, and helping with data analysis. To alleviate many of the States' staffing and technical problems in using the models, OE encourages States to call upon the technical assistance personnel to solve problems at the State level, and, depending on the desires of each State, at the local school district level, too.

Need to improve data

As stated earlier, OE program officials and State education agency officials feel that State evaluation reports are generally not useful for making management decisions; both expressed the need for uniform evaluation methods which would lead to comparable data reporting.

When local title I officials were asked whether or not local districts could compare the data from their local reports with data on the same program contained in State and Federal reports, 49 percent said they could do this only occasionally or seldom with State reports, and 64 percent replied similarly regarding Federal reports. Corresponding results were obtained for titles III and VII.

The results of a 1972 OE-contracted study done by an educational research firm to identify successful State programs and local projects in compensatory education illustrates the lack of reliable, comparable data. According to OE's Assistant Commissioner for Planning, Budgeting, and Evaluation, the study was able to identify only "a discouragingly low number of successful projects," because many projects did not have an evaluation design good enough to produce reliable data on cognitive results and many projects were poorly designed, poorly managed, or badly implemented. Furthermore, the study concluded that the lack of representative data from each State that could be combined in a meaningful way made it extremely difficult to address the effectiveness of the Elementary and Secondary Education Act title I program.

In an attempt to provide a means for Federal, State, and local education agencies to develop comparable evaluative data, OE, through the National Center for Educational Statistics (which was part of OE at that time), funded the "Anchor Test Study." The study was intended to develop tables and procedures for equating test scores among the eight most widely used standardized reading tests for fourth, fifth, and sixth grade children. OE developed the basic plan and the detailed specifications for the study, which was intended to become an integral part of Federal elementary and secondary education program evaluation. OE expected the study to be useful at all levels of educational administration; that is, evaluative results would become useful to State and Federal Governments because program evaluation test data could be combined in a meaningful way. In addition, local school systems could have flexibility in selecting achievement tests to be used in their evaluations.

The results of the Anchor Test Study became available in September 1974. According to our questionnaire, however, as of April-June 1975 all of the 282 projected local education agency respondents indicated they had little or no information about the study. Although the great majority of State respondents knew about the study, only 18 percent had used it.

Test publishers and educational evaluators informed us that the study was technically excellent and potentially useful, but OE had not adequately planned for its use and dissemination. They also noted that the study's usefulness is diminishing as new versions of those tests included in the study are developed and published. State and local education officials interviewed said that the study has had little impact on their evaluation efforts primarily because OE did not pursue its implementation; little effort has been made to direct, encourage, or promote the use of the study so that evaluation results could be made more comparable.

Timeliness

OE often does not receive annual State evaluation reports in a timely manner. For instance, 1 month before the end of fiscal year 1975, less than half of the fiscal year 1974 State elementary and secondary education, title I, program evaluation reports had been received. Notwithstanding OE's attempts to obtain delinquent reports, several States are up to 2 years behind in submitting theirs.

Delinquent reporting helps to prevent meaningful aggregation of State evaluation reports into a national picture of program effectiveness that can affect Federal decisions on funding and program operation. According to an OE program official, some of the more significant reasons they have been given by States for late filing include delays due to

--inclusion of summer program results,

--uncooperative local education agencies,

--differences between OE, State, and/or local agency personnel over what information the evaluation reports should contain,

--low State priority for the programs or their evaluation, and

--schedule slippages in printing, computer, and staff processing of the reports.

CONCLUSIONS

The amount of funds spent to evaluate State education agency titles I and III, and local education agency titles I, III, and VII elementary and secondary education programs is substantial. If the reporting systems based on aggregated local agency data are to be effective, there is a need to improve the adequacy of various aspects of the evaluation reports, including two areas important in determining program effectiveness:

--The credibility of findings.

--The qualification and quantification of measurement data.

The usefulness of the State and local evaluation reports also needs improvements in

--report relevance to policy issues,

--data completeness and comparability, and

--report timeliness.

Valid, complete, and comparable evaluation data is important for results to meaningfully contribute to decisions at all levels. If local and State evaluation data continues to be aggregated for use at higher levels, standardization of data collection efforts and techniques is needed to provide comparable results.

Because of the constraints on the Federal role in education, as discussed in chapter 1 (see pp. 8 to 10), in our opinion it is unlikely that the Federal Government would seek to provide the valid and comparable data needed by dictating uniform evaluation methods and procedures to State and local education agency grantees. In addition, questions exist about whether the title I evaluation models will be able to provide valid and acceptable data to meet program information needs. If these issues are not resolved, we question whether improvements can be made that will enable the reporting systems based on aggregated local data to meet program information needs at Federal, local, and/or State levels.

RECOMMENDATION TO THE SECRETARY OF HEW

We recommend that the Secretary direct OE to assess whether State and/or local evaluation reports for titles I and VII of the Elementary and Secondary Education Act can be improved so that they supply officials at Federal, local, and/or State levels with the reliable program information they need for decisionmaking. This includes assessing the adequacy of the title I evaluation models and related data.

--If OE determines that it is unrealistic to expend resources on improving these programs' State and local evaluation reporting systems based on aggregated data, then it should take the needed steps to adopt more feasible and effective approaches. This should include eliminating unwarranted reporting requirements and if necessary proposing to the Congress any legislative changes needed to accomplish this.

--If, however, these reporting systems are continued, OE should more strongly emphasize improving the adequacy of State and local evaluation reports for title I and local evaluation reports for title VII. This should be done by giving greater management attention and priority to making reports more complete and comparable, relevant to policy issues, timely, credible, and adequate in the qualification and quantification of their measurement data.

AGENCY COMMENTS AND OUR EVALUATION

HEW stated that it concurs with the general thrust of our draft report recommendations for chapters 4 and 7, however, it also stated that most of the actions we proposed are already underway, many by legislative mandate, and in some cases they are near completion.

Our report extensively discusses these actions underway. (See pp. 32 to 34.) HEW's statement implies that the actions underway are likely to be successful. Statements by OE evaluation office officials directly contradicted this implication and questioned the practical feasibility of aggregating local level data. (See p. 33.) We concluded in chapter 4 that there are issues which raise questions about whether the evaluation models will be able to provide valid and acceptable data to meet program information needs. Therefore, we believe that OE needs to assess the effect of the problems connected with its "actions underway" in relation to the feasibility and cost-effectiveness of improving the reporting systems to provide the reliable information needed for decisionmaking at Federal, State, and local levels.

HEW also said that our understanding was incomplete regarding the much needed and legislatively mandated actions to improve State and local evaluations and reporting. In clarifying the meaning of this statement in relation to title I, HEW stated that we should have provided more information relating to the workshops, technical assistance centers, and information dissemination activities relating to the evaluation models mandated by the Education Amendments of 1974. We disagree. Our report discusses each of these issues. (See pp. 32 to 34.) Appendix III provides HEW's additional information on these matters.

Specifically regarding title I, HEW stated that once the models and revised reporting system are in place across the Nation, their use should produce data which can be aggregated across school districts and States. At that time, HEW believes that OE will be in a better position to assess whether or not the data are sufficiently free of systematic errors to support satisfactory aggregations to the State and national levels. If they are not, HEW stated it can then determine whether technical problems could be overcome or whether different kinds of studies are needed to satisfy Federal, State, and local reporting requirements.

We believe that to foster maximum efficiency and economy OE should make the needed assessment as soon as it has a good enough understanding, if it does not already, of such factors as the likely validity, reliability, and comparability of the reporting system data as well as the other methodological, fiscal, and political problems involved.

HEW also stated that OE has interviewed personnel in Federal policymaking roles and received information from an advisory title I group (which included parent representatives) on the kinds of information that should be included in the annual State and local evaluation reports. In addition, evaluation models and their reporting forms were developed and reviewed by each State agency and three of its local agencies to identify possible problems. As a result of all these efforts, a limited core of essential information was identified as "desirable at the Federal level" and this will become the Federal evaluation requirement when regulations for this portion of the legislation are published.

We commend efforts to identify the Federal information requirements. However, we remain concerned about the identification of State and local agency information requirements and whether these needs can all be met by the same reporting system. We are also concerned about the possible unnecessary duplication of using both this reporting system and OE national evaluations on these programs to meet these Federal information requirements.

With respect to title VII, HEW stated that local evaluation reports can be improved and cited the following steps intended to accomplish this:

--HEW has recently published regulations strengthening requirements for bilingual project evaluation.

--The National Institute of Education and OE have a joint project underway to upgrade the technical expertise of local evaluators.

Although HEW indicated that aggregating local title VII data is more difficult than for title I, aside from concurring with the general thrust of our recommendation, it did not respond to our proposal for OE to assess whether it is realistic to try to improve local title VII reports so that they supply Federal-level decisionmakers with the reliable information they need.

General comments

In addition, HEW provided several general comments. These observations and our responses follow.

HEW comment

HEW stated that the report needs to give more careful consideration to evaluation costs and that the quality of data the report "appears to expect" would require significant additional resources which would be high in relation to the possible payoffs through program improvements.

Our response

These comments ignore the cost-effectiveness considerations of our recommendations. In addition, HEW has misinterpreted what our report expects. Although HEW comments did not recognize or respond to this proposal, our draft report proposed that OE assess whether it is realistic to expend additional resources on improving the State and local reporting systems for titles I and VII. If OE determines that it is not realistic, then we proposed that it initiate action to eliminate unwarranted reporting requirements, including proposing to the Congress any needed legislative changes. We would certainly expect cost-effectiveness considerations to be a part of OE's assessment.

Our draft report also proposed (see p. 76) that in connection with this assessment, OE determine (1) whether it is realistic to try to serve Federal, State, and local levels with information based on local agency evaluations and (2) how the information needs at Federal, State, and local levels can best be met. HEW comments also did not recognize or respond to this proposal.

These proposals certainly do not require "significant additional resources" on reporting systems. In fact, they question the value of present and proposed expenditures and suggest that OE face this issue. We recommend this assessment because it is not clear and has not been demonstrated that the reporting systems based on aggregated local level data are now providing or can be made to provide valid, useful, and cost-effective data to Federal, local, and/or State decisionmakers. In our view, significant additional resources should not be expended until there is some solid evidence that they would be cost-effective.

HEW comment

HEW stated that the report does not give adequate recognition to whether the tradeoffs in improved program quality are likely to justify additional spending.

Our response

Once again, HEW has misinterpreted our draft report proposals. As discussed above, we proposed that OE make the needed assessment to determine the realism of trying to improve there reporting systems. We believe that such an assessment, if properly conducted, would necessarily include consideration of the tradeoffs involved. In our view it is the agency's responsibility to make such assessments. This is especially true in this situation where, as discussed in this chapter, not only have OE-funded studies shown significant problems but OE evaluation office officials have expressed serious questions about the feasibility of the approach currently being followed to solve these problems.

HEW comment

HEW took exception to our statement that the "amount of funds spent to evaluate State and/or local education agency titles I, III, and VII elementary and secondary education programs is substantial," saying that the percentages of funds involved at the State level are not substantial.

Our response

The amount that we intended to refer to is the total reportedly spent not only on State evaluations for titles I and III, but also on local evaluations for titles I, III, and VII. This totals in excess of $42 million--this is a substantial amount.

CHAPTER 5

USING STANDARDIZED TESTS

State and local education agencies generally use standardized "norm-referenced" tests to measure the effectiveness of Federal elementary and secondary education programs. OE's national evaluations also frequently use these tests.

Most State and local respondents to our questionnaires believe there is a substantial or very great need for increased efforts to develop alternatives to standardized norm-referenced tests, such as "criterion-referenced" tests. Many of these officials also believe that increased efforts are needed to reduce racial, sexual, and cultural biases in tests. The questionnaire results indicated a lack of awareness among State and especially local agency officials on information available to help them select appropriate standardized tests.

USES AND IMPLICATIONS OF STANDARDIZED NORM-REFERENCED TESTS

Standardized norm-referenced tests were devised to measure the status of an individual in relation to other individuals--the norm group. The score an individual receives has meaning in relation to the performance of the norm group, not the educational objectives involved; therefore, such tests are described as norm-referenced.

A standardized norm-referenced test differs from other tests given by schools in that it (1) is almost always constructed by specialists in educational testing, (2) has explicit instructions for standard or uniform administration, and (3) has norms for interpreting test results. These norms have been derived from giving the test to a sample of persons intended to represent the whole group for whom the test is designed.

There are many kinds of standardized tests given in schools, business, and the military services: intelligence, academic aptitude, achievement, personality, attitude, interest inventory, and vocational aptitude tests. In discussing tests, this report deals almost exclusively with achievement tests--those which measure current knowledge or competencies. Most of the standardized tests that children take in school are of this kind. Today the typical schoolchild takes one to three such tests every year.

Five or six companies account for about three-fourths of the total test sales in the country. These companies have all been in the testing business for a long time; most helped pioneer the testing field in the 1920's. The companies all sell a wide variety as well as a large volume of tests (most list more than 100 tests in their catalogues), and provide extensive services to test customers. These factors contribute to the widespread use and acceptance of the tests.

Standardized norm-referenced achievement tests are used to evaluate both individuals and programs. For student evaluations, the tests are used to rank or compare students for such purposes as counseling them, assigning them to a class within a grade or a group within a class, assigning students to a special program (for example, for the retarded or gifted), indicating the kind of courses a student may take in junior high school or high school, or gaining admittance to college or graduate school. In relation to program evaluations, standardized tests are used widely at the Federal, State, and local levels, to determine the effectiveness of OE programs such as titles I, III, and VII of the Elementary and Secondary Education Act.

WIDESPREAD STATE AND LOCAL USE OF STANDARDIZED NORM-REFERENCED TESTS TO EVALUATE FEDERAL PROGRAMS

Most OE-funded evaluations of Federal education programs at the national, State, and local levels have at least one common purpose: they are to measure and report on the effectiveness of federally funded programs and projects. Many State and local evaluations are congressionally mandated, and national evaluations, according to OE evaluation officials, are conducted either because of a congressional request or to provide responsible agency officials and congressional members with nationally comparative data about a particular program or approach to education. These national evaluations frequently use standardized tests.

The General Education Provisions Act (20 U.S.C. 1231a) requires OE to collect information intended to objectively measure the effectiveness of education programs and permits local education agencies to use systematic measurement approaches, approved by the Commissioner of Education, that will assure adequate evaluation of each program.

Our questionnaire asked State education agencies which of several techniques they employed for their 1973-74 evaluations of projects funded through titles I and III of the Elementary and Secondary Education Act. The following table shows the results for respondents in the 48 States that answered this question:

State Education Agency Techniques for Evaluating Titles I and III

Techniques	Title I Number	Title I Percent (note a)	Title III Number	Title III Percent (note a)
Aggregation and analysis of data from local education agency reports	45	94	41	85
Educational audits and their results	9	19	27	56
Statewide testing of students	11	23	5	10
Other	5	10	12	25

a/Does not total 100 percent because some States used more than one technique.

The distribution of responses shows that some States used a combination of techniques, and most States aggregated local education agency data. Only a small number of States employed statewide testing to evaluate their programs. However, the great majority of those that did test statewide in their program evaluations used standardized norm-referenced tests.

Because most States perform their evaluations by aggregating and analyzing data from local education agency reports, it is very important that local education agencies use test measures which reflect meaningful and comparative data. Our questionnaire asked local education agencies to indicate which types of tests they used in their 1973-74 evaluation of Federal programs funded through the Elementary and Secondary Education Act, titles I, III, and VII. The following table shows their responses.

Types of Tests Used by Local Education Agencies (note a)

Type of Test	Title I		Title III		Title VII (note b)	
	Number	Percent	Number	Percent	Number	Percent
Standardized norm-referenced tests	8,103	94.4	1,380	79.1	357	90.7
Criterion-referenced tests (note c)	2,110	24.6	424	24.3	148	37.5
Other tests	1,168	13.6	515	29.5	91	23.0

a/Local education agency figures are projected on the basis of a statistical sample of local agencies. (See app. II.) The percent columns do not total 100 percent because some local agencies used more than one type of test.

b/Title VII provides for direct OE grants to local agencies without State level administration.

c/Tests which are designed and scored in relation to specific learning objectives or behaviors and include an explicit statement of performance standards.

The local education agency responses show predominant use of standardized norm-referenced tests for program evaluation, but also relatively large use of criterion-referenced tests.

Frequent use of criterion-referenced tests was also reflected in State education agencies' responses to a question on the use of statewide assessment programs to achieve educational accountability--an effort separate and distinct from testing used to evaluate Federal programs. Of 47 States responding to this question, 36 said that criterion-referenced tests have been or will be used extensively in that context.

EFFORTS TO EVALUATE STANDARDIZED TESTS

Since its establishment, NIE's major research effort for improving educational measurement has been an ongoing evaluation of commonly used standardized tests. In 1972 NIE assumed from OE the sponsorship of the Center for the Study of Evaluation at the University of California at Los Angeles. The Center extensively assesses published standardized tests and as a primary objective issues reliable guides for use in selecting tests.

As of September 1975, the Center had published guides which evaluate preschool and kindergarten, elementary, and secondary school achievement tests. Each guide contains a compendium of tests, keyed to educational objectives and evaluated by measurement experts and educators for such characteristics as meaningfulness, examinee appropriateness, administrative useability, and quality of standardization.

A Center official said that he believes that commercially available standardized norm-referenced achievement tests are generally inappropriate for measuring program effectiveness. Various Center reports also state this opinion for reasons discussed in chapter 6, such as the tests' low degree of correspondence with actual instructional objectives, their failure to indicate the extent that the full range of instructional objectives has been mastered, problems in test administration, and the test's lack of information on specific skill and knowledge development. The Center official noted that the tests are especially inappropriate for broad-based intervention programs, such as title I of the Elementary and Secondary Education Act.

Since the major purpose of the guides is to provide State and local educators and other test consumers with information that will assist them in selecting the most appropriate measurement devices for evaluations, our questionnaire included a question relating to the Center's work. We asked State and local education agencies to indicate the degree of familiarity they had with the Center's research on evaluating the utility of many popular commercially available standardized norm-referenced tests. Their responses follow:

Responses	State education agencies Number	State education agencies Percent	Local education agencies Number (note a)	Local education agencies Percent
Have little or no information	6	12	5,059	85
Aware of the Center's work in test evaluation	14	28	601	10
Read some of the Center's publications	17	34	192	3
Used the Center's material in the selection of commercially available standardized tests	13	26	135	2
Total	50	100	5,987	100

a/Local education agency figures are projected on the basis of a statistical sample of local agencies. (See app. II.)

There was general agreement among the educators and test publishers interviewed that the Center's work was a definite improvement over other existing evaluations of standardized tests. Some test publishers, however, criticized the Center's work because it was based on incomplete data, excluding, for example, the highly technical specifications from which test questions are developed. They also criticized it for establishing educational goals on which test ratings were based without consulting publishers, and for relying on the work of graduate students.

In response, Center officials indicated that they had sent letters to test publishers advising them of the study and its purpose, stating what information was desired, and asking for any other material the test publishers wished to send. They acknowledged that their curricular goal system is not perfect; however, they believe it is a tremendous step forward, providing a clear statement of expected student behaviors which test users can employ to match tests to curriculums. Officials also stated that the system is justified because test makers often measure skills that are different from what they claim to measure. Center officials also noted that all participating graduate students demonstrate adequate competence in research and measurement before being hired; they followed set procedures, were routinely monitored, and discussed questionable points with supervisors.

State education agency officials and measurement experts interviewed stated that the Center's work should be continually updated and should include an assessment of available criterion-referenced tests.

Commenting on our report, HEW stated that NIE is sponsoring an effort by the Center to prepare a new test evaluation book reviewing all commercially published criterion-referenced achievement tests for grades kindergarten through 12. The target date for publishing this book was June 1977; however, as of August 1, 1977, it had not been published.

CRITERION-REFERENCED TESTS

Our questionnaire asked State and local education agencies to indicate areas, if any, in which there is a need to increase the educational community's efforts devoted to measurement and assessment techniques. Over 75 percent of the State education agency respondents and about 51 percent of school district respondents indicated "development of alternatives to the classic standardized norm-referenced tests (e.g., criterion-referenced tests)" as an area needing substantial to very great increases. More than half of the State respondents and a third of the local respondents also believe there is a great need to reduce racial, sexual, and cultural biases in tests. The following table shows the percent and number of State and local agency respondents indicating a substantial or very great need to increase the educational community's efforts devoted to measurement and assessment techniques.

	State agency responses		Local agency responses	
	Percent (note a)	Number	Percent (note a)	Number (note b)
Development of methods for test design and construction	52	25	34	2,507
Reduction of cultural, racial, and sexual biases in tests	51	25	35	2,581
Development of alternatives to the classic standardized norm-referenced tests (e.g., criterion-referenced tests)	77	37	51	4,061
Development of more and improved standardized norm-referenced tests	18	9	27	2,177
Development and utilization of methods to better evaluate standardized norm-referenced tests in use	40	20	43	3,409

a/Does not add up to 100 percent because more than one item could be checked. The percentages reflect only the number of State and local agencies that responded to each suggested item. (See apps. I and II, question 3.)

b/The number of local agencies is projected on the basis of a a statistical sample. (See app. II.)

NIE is currently funding research intended to meet these needs in the areas of test biases and criterion-referenced measurement.

Criterion-referenced tests are designed to remedy some weaknesses in standardized norm-referenced tests (see ch. 6) by (1) being more accurately interpretable, (2) detecting the effects of good instruction, and (3) allowing more accurate diagnoses of the individual learner's capabilities.

A well-devised criterion-referenced test relates scores to specific learning objectives or behaviors and includes an explicit statement of performance standards. The objectives must be described without ambiguity to permit an accurate description of what an examinee does and does not know or can and cannot do. Criterion-referenced tests pinpoint the student's deficiencies, while a norm-referenced test identifies only general student weaknesses.

Because criterion-referenced tests are not required to yield large variances in examinee's scores, they can retain questions based on the primary curricular emphasis even if, after instruction, most learners answer them correctly. Consequently, criterion-referenced tests are considered more capable of discerning instructional effects than norm-referenced tests.

An increasing number of educators have begun to question the use of standardized norm-referenced tests and to propose criterion-referenced tests as an alternative. Some people assume that the latter are fully developed and ready to use. According to experts, however, the technical status of criterion-referenced measurement is far less advanced than many educators and others believe it to be.

An expert in criterion-referenced testing from the University of Michigan has pointed out that producing test questions that can be defended as valid and fair for both the majority of examinees and various minority groups is a major problem that affects the development of both standardized norm-referenced and criterion-referenced tests.

Another expert in criterion-referenced testing from the California Test Bureau of McGraw-Hill has stated that carefully constructed criterion-referenced tests can provide both diagnostic and evaluative information that is appropriate not only for disadvantaged students but also for all students, assuming some consensus can be obtained on instructional objectives to be tested. Therefore, such tests could discover real educational problems and indicate appropriate remedial help for students, rather than simply showing that the students are "below grade level" on a general test of reading or mathematics. He added, however, that constructing such criterion-referenced tests is not a simple matter. More knowledge is needed about the structure of subject matter than now exists. Nevertheless, successful statewide assessments and evaluations have been carried out using only criterion-referenced tests.

This testing expert believes that in the future it will be possible to evaluate basic skills on a large scale using appropriate criterion-referenced tests when sufficient knowledge has been acquired to specify the important skills and subskills required to assure competence in these areas. For this to occur, an understanding of the particular problems facing disadvantaged and minority students as well as the basic logical and cognitive structure of disciplines will be needed. In his opinion, progress is being made on these problems, but as yet no widespread consensus of what is important has emerged. Until it does, no national criterion-referenced evaluations seem likely.

Commenting on our report, HEW stated that, based on the test evaluation being made by the Center for Study of Evaluation at the University of California at Los Angeles commercially published criterion-referenced tests, like many norm-referenced tests, were generally unsatisfactory for program evaluation.

CONCLUSIONS

Federal, State, and local education agencies frequently use standardized norm-referenced tests to measure the effectiveness of Federal education programs. The next chapter provides further discussion of some of the tests' problems, including test biases. Additional research may be needed on:

--Criterion-referenced tests and other alternatives to standardized norm-referenced achievement tests, for uses which include program evaluation.

--How to reduce racial, sexual, and cultural biases in standardized tests.

There is also a need to increase State and especially local education agency awareness of available NIE-funded information that is intended to help select the most appropriate tests for use in evaluation.

RECOMMENDATIONS TO THE SECRETARY OF HEW

We recommend that the Secretary direct NIE to:

--Consider the need for funding additional research in the future on (1) criterion-referenced tests and other alternatives to standardized norm-referenced achievement tests for uses that include program evaluation and (2) the nature and extent of racial, sexual, and cultural biases in standardized tests and how such biases may be reduced.

--Improve dissemination of available NIE-funded information, which is intended to help select the most appropriate standardized tests, thereby increasing State and local education agency officials' awareness and use of this information.

AGENCY COMMENTS AND OUR EVALUATION

HEW agreed with the above recommendations. Regarding our recommendation that NIE consider the need for funding additional testing research, HEW described efforts currently underway and stated that more emphasis will be given to these programs in fiscal years 1977-79 if NIE's appropriation levels permit. However, HEW also stated that it is not clear whether we believe NIE deserves additional appropriations for such an effort since NIE cannot divert substantial funds from its present budget. It is not our intention to call for either additional appropriations or redirection of NIE's present budget. Our recommendation calls on NIE to consider funding additional research, as needed to address the problems discussed, that could begin when research efforts currently underway are completed.

Regarding our recommendation that NIE improve dissemination of its materials designed to help select standardized tests, HEW stated that NIE intends to make school personnel familiar with these materials through several dissemination approaches. These include:

--Listing the test evaluation consumer guides in a catalog of NIE products sent to school superintendents and district curriculum directors and which will now be sent to school district evaluation directors.

--Using the new "Lab and Center R&D Exchange," which HEW believes will possibly reach 50 percent of the country's school systems.

--Using the dissemination network formed by NIE's seven research and development utilization contractors.

CHAPTER 6

STANDARDIZED TESTS AND PROGRAM EVALUATION

Serious questions have been raised about standardized norm-referenced achievement tests in spite of their widespread use. Based on the views of test and evaluation experts and others, this chapter provides information concerning: (1) criticism and defense of these tests and (2) suggestions for alleviating problems in conducting large-scale evaluations of compensatory education and desegregation programs.

CRITICISM OF STANDARDIZED NORM-REFERENCED TESTS

The content and use of standardized norm-referenced achievement tests have been widely criticized by testing experts, educators, and others. The National Education Association, the National Association for the Advancement of Colored People, and others have called for moratoriums on using standardized tests. 1/

The National Association of Elementary School Principals convened the appointed representatives of 25 national educational associations, government agencies, and education groups in November 1975 to explore the implications of the widespread use of standardized achievement tests. They recommended that the educators give higher priority to developing and using new assessment processes that are more fair and effective than those currently in use and that educators more adequately consider the diverse talents and cultural backgrounds of children.

Criticism of norm-referenced tests

Critics of the standardized norm-referenced achievement tests believe test bias and score interpretation, as well as other problems, are some of the test's deficiencies.

1/Robert L. Williams, et al., "Critical Issues in Achievement Testing of Children from Diverse Ethnic Backgrounds," prepared for the Office of Education's Conference on "Achievement Testing of Disadvantaged and Minority Students For Educational Program Evaluation," May 27-30, 1976, pp. 8-12.

Test bias

A frequent criticism is that the tests discriminate unfairly against racial and cultural minorities because (1) their norms continue to be based on populations not representative of a pluralistic, multicultural society and (2) test questions ask for knowledge most familiar to the white middle class or reflect the cultural biases of test developers and question writers, who mostly represent the white middle class. Therefore, the tests are considered biased against the poor, black, Hispanic, and other minority Americans. Although some test publishers have attempted to minimize cultural and racial biases, these problems have not been solved.

Score interpretation

Some critics cite certain weaknesses in the interpretation of test scores, as follows:

--Raw scores (scores based on the total number of correct answers on a test) are typically interpreted in terms of national norms, which are estimates of nationwide performance. The national norms are derived from giving the test to what is intended to be a representative sample of students. But since the samples are different and taken at different times, the norms for different tests vary. As a result, the normed score for a student depends partly on which test the student takes. 1/

--The grade equivalent score represents the estimated average score that pupils in that month of that grade would achieve on the test nationwide. For example, a 3.8 in reading is the average score for a child in the eighth month of the third grade. A frequent misconception is that the score means the child has mastered the standard curriculum up to that point in schooling. Even if the 3.8 grade-equivalent were always an accurate estimate of the average achievement for the child in the eighth month of the third

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1/George Weber, "Uses and Abuses of Standardized Testing in the Schools," Council for Basic Education, May 1974, pp. 13-14.

grade, that average child has not necessarily "mastered" the reading curriculum to that point, although parents, and even teachers usually do not understand this. Another problem is that on some tests a few answers one way or the other can make as much as a whole year's difference in the grade-equivalent score, and the tests are simply not that accurate. Despite these and other shortcomings, grade-equivalent scores are usually used in interpreting the results of standardized achievement tests. 1/ 2/

--Test scores are meaningful only in terms of national average achievement, and do not indicate whether this is good, bad, or indifferent in terms of "reasonable" standards defined independently of such average scores. For example, if a given third grade class does as well on a given reading test as the national third grade average, this does not reveal how well the children can read in absolute terms. According to this viewpoint, since reading achievement in the primary grades is generally below what could reasonably be accomplished, reading scores suggest a better achievement than is in fact the case. 3/ Moreover, critics say that norm-referenced tests result in half of the students being above the norm and half below, as a statistical fact of life. Then how, they ask, does one "raise scores to the general norm?" 4/

1/*Ibid.*, pp. 14 and 16.

2/Ralph Tyler, "Discussion of Hoepfner's Paper on Achievement Test Selection for Program Evaluation," prepared for the Office of Education's conference on "Achievement Testing of Disadvantaged and Minority Students for Educational Program Evaluation," May 27-30, 1976, p. 7.

3/Weber, p. 20.

4/Miriam Clasby, et al., "Laws, Tests, and Schooling: Changing Contexts for Educational Decision-Making," RR-11, Educational Policy Research Center, Syracuse University Research Corporation, Syracuse, N.Y. Oct. 1973, p. 174.

Other problems affecting test use

Regarding the use of standardized norm-referenced tests in program evaluation, critics state that the tests are inadequate for evaluating program effectiveness and cite the following deficiencies.

Test results not specific--Normative test scores might be very useful for program evaluation if one knew what they meant. But the test results do not indicate specifically what students have learned. 1/ The test scores reflect the number of correct answers students give, but do not indicate how well students achieve intended educational objectives or whether they answer particular questions correctly. 2/ 3/ Therefore, the test results are too general to provide specific guidance for improving the quality of schooling. 4/

Tests do not coincide with instructional objectives--The tests' content often has a low degree of correspondence with actual instructional objectives at any given time or place. This is a serious deficiency because one cannot determine the effectiveness of an educational program unless the tests used actually measure the objectives that the teacher, teachers, or school district is attempting to accomplish over

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1/Stephen Klien, "Evaluating Tests in Terms of the Information They Provide," Evaluation Comment, Vol. 2, June 1970, Center for the Study of Evaluation, University of California at Los Angeles, p. 2.

2/National Assessment of Educational Progress, "General Information Yearbook," Dec. 1974, Rept. No. 03/04-GIY, pp. 1, 3, and 4.

3/Carmen J. Finley, "Not Just Another Standardized Test," Compact Vol. 6, No. 1, Feb. 1972, Education Commission of the States, pp. 10 and 11.

4/W. James Popham, "Appropriate Assessment Devices for Educational Evaluation," presented at the National Forum on Educational Accountability in Denver sponsored by the Office of Education and the Cooperative Accountability Project, May 8-9, 1975, pp. 3 and 4.

a defined period of time. 1/ As a major test publisher 2/ and others have pointed out, it is only to the extent that a program's instructional objectives coincide with those of the test that the instrument is valid for measuring how well the learning program has succeeded. If the test fails to measure certain objectives included in the learning program and/or measures other objectives that are not part of that program, to that extent the test is not a valid measure of success in the program.

In addition, test publishers describe their standardized norm-referenced tests in very general terms, calling them, for example, tests of reading comprehension. The generality of these descriptions increases the possibility of unrecognized differences between what the schools teach and what the tests specifically measure. According to this view, such differences result in misleading data and false conclusions about program effectiveness. 3/

Tests are designed to differentiate students, not diagnose specific problems--Since the tests are intended to compare examinees, they must yield a reasonably large degree of "response variance"--different scores for different examinees. Test questions that are answered correctly by half the examinees maximize a test's response variance. If a test question is answered correctly by a large or increasing proportion of examinees, it tends to be removed from the test or modified. Thus, as norm-referenced tests are periodically revised, questions on which examinees perform well are systematically eliminated. Yet, test critics maintain that such questions often deal with the very concepts teachers thought important enough to emphasize in their instruction. If a concept is taught well, questions measuring it will likely be removed in the next test revision. The

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1/Rodney Skager, "The System for Objectives-Based Evaluation-Reading," Evaluation Comment Vol. 3, No. 1, Sept. 1971, Center for the Study of Evaluation, University of California at Los Angeles, p. 6.

2/J. Wayne Wrightstone, et. al., "Accountability in Education and Associated Measurement Problems," Test Service Notebook 33, Issued by the Test Department, Harcourt Brace Jovanovich, Inc., New York, p. 4.

3/Popham, p. 3.

result is that (1) the tests are particularly insensitive to detecting the effects of instruction 1/ 2/ and (2) sometimes the tests do not contain test questions dealing with the central concepts in the field. These are serious deficiencies for a test used for program evaluation. 1/ 3/

Teaching the test--According to some critics, the use of standardized achievement tests for program evaluation and "accountability" has led and will lead to corruption and dishonesty among educational professionals and to the further erosion of public trust in the schools and the people who run them. Faced with public pressure that is often in itself "irrational and destructive," it is all too easy for principals and teachers to respond to subtle pressure to "prepare students for the assessment" by teaching students responses to specific test questions rather than by developing the underlying skills which these questions reflect. Standardized tests are readily available at all levels of any school system, and are brief enough to be highly susceptible to coaching. Test security and control may be feasible for programs like the college boards or the American College Testing Program, in which representatives of the testing agency handle the assessment and the examinees come to a central location. Similar controls are not feasible in large-scale evaluations of school programs. 4/

Inappropriate norms--In the typical large-scale program evaluation, the focus is on performance of groups by students--categorized by classes, buildings, or school systems--not by individuals. The reference norms one needs for such purposes are distributions of averages for appropriate reference schools, not norms for individuals; and these types of

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1/*Ibid*., pp. 4 and 5.

2/Richard M. Jaeger, "A Discussion of Classical Test Development Solutions," prepared for the Office of Education's conference on "Achievement Testing of Disadvantaged and Minority Students For Educational Program Evaluation," May 27-30, 1976, p. 6.

3/W. James Popham, Statement presented at U.S. House of Representative hearings on the Elementary and Secondary Education Act, March 28, 1973, pp. 2323 and 2324.

4/See Skager, p. 7.

norms are seldom available unless they are collected as part of the evaluation study itself. 1/

Measurement of growth

A major test publishing company has described 2/ various technical problems with the tests that are related to their use in measuring academic growth, as contrasted against their traditional use for measuring present status. This is significant, because according to the company most educational program evaluations have involved using nationally standardized norm-referenced achievement tests--especially for measuring "growth." Besides the problems related to using tests to measure present status--such as selecting a test that measures what the user intends, assuring that teachers follow directions, and the like--the test publisher noted that when the tests are used to measure growth they are attended by special problems, such as the following:

--Defining "normal growth." There are serious questions about the legitimacy of defining normal growth in terms of grade-equivalent scores. However, expected or normal gain is almost universally defined in terms of grade equivalents for standardized achievement tests used at the elementary level.

--Interpolating or estimating norms so that they may be applied to tests taken at times during the year for which norms have not been empirically determined. These estimates are almost certainly in error by some small amount in most cases and by a substantial amount in some cases.

--Converting scores from different levels and alternative forms of a standardized test series so that the scores are equivalent. If they are not equivalent, this can lead to invalid measurement of gains and possibly erroneous conclusions as to the merit of the program evaluated.

1/William E. Coffman, "Classical Test Development Solutions," prepared for the Office of Education's conference on "Achievement Testing of Disadvantaged and Minority Students For Educational Program Evaluation," May 27-30, 1976, p. 24.

2/Wrightstone, et. al., pp. 5-12.

The above criticisms of standardized norm-referenced tests indicate that the tests may be inappropriate for wide-scale use in evaluating educational programs.

Why are standardized tests used?

Considering all these criticisms, why are the tests used for Federal program evaluations? A former OE evaluation official explained that standardized achievement tests are used in educational program evaluation "for many good and not-so-good reasons" such as the following:

--Since many standardized achievement tests or subtests were developed primarily for basic skill performance measurement, they become prime candidates for evaluating programs that seek to improve basic skills.

--Such tests are readily available in large quantities, at short notice, and at relatively low cost. If off-the-shelf tests were not available, the cost of developing and standardizing such measures for a specific evaluation might be prohibitive and therefore might cause abandoning evaluation plans.

Other, more technical reasons given by this former OE official for the widespread use of standardized achievement tests in education program evaluation include their general technical excellence, their standardized administration procedures, the representativeness of their questions to the possible universe of questions on basic skill performance, their normative reference, ease in scoring, alternative and equated test forms, high reliabilities, and apparent validity. Another factor, he stated, is that most achievement tests are part of a battery of tests designed so that student growth can be measured as the student progresses through school by administering different test levels and forms. 1/

1/Michael J. Wargo, "An Evaluator's Perspective," prepared for the Office of Education's conference on "Achievement Testing of Disadvantaged and Minority Students For Educational Program Evaluation," May 27-30, 1976, pp. 19-21.

DEFENSE OF STANDARDIZED TESTS

Defenders of the tests say that there is no convenient alternative for those outside the schools to evaluate students' collective achievements. Therefore, in their view, despite the tests' shortcomings and abuses, they provide the best information available. According to OE's Assistant Commissioner for Planning, Budgeting, and Evaluation, it is true that standardized tests do not allow for program and project differences, but the Congress wants to know if the overall program is effective, and he believes the tests provide this information acceptably.

Defenders of standardized tests tend to emphasize test misuse as the major problem, and they express the need for training teachers and administrators in proper test selection, administration, and interpretation. Many testing experts admit that the tests have deficiencies--such as test and test question bias--but state that wholesale rejection of the tests and their norm-referenced interpretations is unwarranted. Instead, they favor refining the tests and learning to avoid pitfalls, such as lack of congruence among (1) test content, (2) course content or curricular emphasis, and (3) the purpose and design of the evaluation. Some state that progress has been made in the last 10 to 15 years in such areas as

--constructing efficient tests that reliably measure important educational skills,

--developing nationally representative norms, and

--providing test users with relevant information about the test areas. 1/ 2/

1/John C. Bianchini, "Achievement Tests and Differentiated Norms," prepared for the Office of Education's conference on "Achievement Testing of Disadvantaged and Minority Students For Educational Program Evaluation," May 27-30, 1976, pp. 36-37.

2/Ralph Hoepfner, "Achievement Test Selection For Program Evaluation," prepared for the same conference, p. 2.

One expert from Systems Development Corporation, for example, stated that the quality, forthrightness, and focus of standardized achievement tests have improved remarkably, particularly within the last decade, and that many well-aimed attacks on standardized achievement tests made about 10 years ago are no longer valid. 1/ This expert, who has considerable experience in evaluating test adequacy, stated that his review of available criterion-referenced tests--the most likely alternative--found them to be of uniformly bad quality.

An expert from RMC Research Corporation said that the standardized tests are not the problem. In his view, OE's large-scale national evaluations as well as most local evaluations have been poorly designed and poorly done, and the tests have often been misused by evaluators. He said that he recently spent about 2 weeks in every State working on title I, dividing his time equally between the State education agencies and some local education agencies in each State. Based on this experience, he believes that the great majority of local title I projects is not providing students with educational treatments that differ in any significant way from regular classes. In such circumstances, the general lack of evidence of marked improvement in basic skills should not be too surprising.

Suggested improvements

Included among suggestions for improvement offered by test defenders are the following:

- --Test publishers, in developing standardized tests of basic skills, should break away--at least in the elementary grades--from the current practice of designing tests for measuring achievement at multiple grade levels. Test publishers should develop series of tests, each designed for a specific grade, with sufficient numbers of questions at various difficulty levels to yield reliable measurement for essentially all students at that grade.

- --Test publishers should provide more detailed information about the content of test questions, the instructional objectives on which questions are based, and the skill characteristics needed to answer them to

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1/Ibid., p. 2.

provide test users with a general framework for assessing the logical congruence between the test content and the content of the curriculum. In one expert's view, such a detailed classification of individual questions is as important to the test user as is the extensive statistical data currently provided about the mental measurement characteristics of the questions.

--Test publishers should expand the services they provide their clients to include developing special norms when they would produce more appropriate use of test results. Test publishers need to be more active in assuring that their tests and subsequent test results are used fairly and effectively.

--The state of the art should be extended to provide test users with practical procedures to assist them in selecting tests and relating test results to instructional programs and program evaluation.

--Program evaluators should recognize that the process for selecting appropriate standardized tests for evaluation must go beyond a naive inspection of the test and normative data. The process ought to include a careful inquiry into such elements as relevant student and school characteristics, test content and its relationship to curriculum content, and the adequacy of normative data in relation to the evaluation design. 1/ Evaluators should select tests which maximize coverage of the objectives desired. 2/

CONFERENCE ON USING TESTS TO EVALUATE PROGRAMS

In May 1976 OE sponsored a special four-day conference on "Achievement Testing of Disadvantaged and Minority Students for Educational Program Evaluation." OE invited about 50 experts in testing, program evaluation, and related fields including university and other researchers, and representatives of leading test publishers. Federal and local education agencies, and education and other interest groups were also represented. The conference focus was on large-scale

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1/Bianchini, pp. 36-38.

2/Hoepfner, p. 33

program evaluations of elementary and secondary school compensatory education and desegregation programs--programs on which OE concentrates most of its effort. The purpose of the conference was to identify, define, and analyze the many problems associated with using standardized achievement tests in the context of large-scale evaluations of these programs and to develop interim and long-term solutions to those problems.

Conference participants mentioned many of the same problems and issues discussed previously in this chapter. Five small working groups were formed at the close of the conference to write recommended solutions. All five groups recommended (1) either limiting or ceasing large-scale Federal education program evaluations like those contracted for by OE's Office of Planning, Budgeting, and Evaluation and/or (2) placing greater emphasis on local evaluations.

The value of conducting large-scale evaluations was questioned because of problems such as the current state of the art in evaluation; inherent bias problems in data collection instruments, methods, and analysis procedures; and community differences in the education programs being evaluated. Suggestions for increased emphasis on local level evaluations included providing funding for adequate local evaluations, training local evaluators, and technical assistance in designing and implementing technically sound evaluations.

Related conclusions and recommendations included the following:

1. The Federal Government's basic policy for evaluating its education programs for culturally different students should require that each local education agency carry out evaluation studies designed to assess how well its local project objectives have been achieved. Also, approved local agency budgets should include sufficient funds to provide for adequate evaluation study design, data collection, analysis, and reporting. The studies should involve at all stages the participation of members of the minority culture or cultures involved. Beyond this, Federal responsibility should be limited to (a) conducting and publicizing the results of audits that determine whether funds were used as intended and whether evaluation data relevant to program objectives were collected, analyzed and reported; (b) providing general guidelines and training

for evaluation, and encouraging the development of guidelines and consulting resources by State agencies and Federal regional offices; and (c) developing summary reports based on the aggregation of information from local evaluations.

2. To resolve Federal program evaluation problems:

--The funds and activities devoted to large-scale evaluation should be immediately rechanneled into development of program evaluation methods and tools that are likely to be more productive, while affording safeguards for recipient populations.

--Studies should be initiated to explore whether it is feasible to draw overall program impact conclusions based on aggregations. Valid, locally relevant project evaluations should also be started.

--Immediate congressional needs for program impact information should be satisfied through careful and extensive analysis in phases of data already collected and data currently being gathered under contract.

--Model local project evaluations should be funded as demonstrations, with support from experts funded by OE's Office of Planning, Budgeting, and Evaluation. This support should be provided to local school systems on a cooperative basis. Local evaluation personnel should be trained. The most effective local evaluation strategies demonstrated should be adopted in an ever-widening pattern, to build a basis for effective national program evaluation by aggregating valid local project evaluations.

--Studies should be funded on tools and procedures needed to make local evaluations that will reflect valid conclusions on the worth of specific projects and will adequately identify the processes and inputs of those projects. This includes holding a workshop to identify needed tools, methods, and priorities.

--Studies should be funded on OE and State education agency regulations, guidelines, and administrative decisions that affect the quality of local education agency evaluation activities and reports. These studies should produce model administrative and regulatory strategies, including incentives, for upgrading the quality and validity of local education agency evaluations of federally supported projects.

3. One reason for greater emphasis on local evaluations is that instructional treatments are not uniform under nationwide programs. The Emergency School Aid Act program, for example, does not provide uniform treatments for students. Neither do title I or title VII programs. But there are various identifiable, describable, instructional treatments funded by these programs and a small number of them are effective. However, information about these effective treatments is lost in large-scale evaluations that cover a large number of ineffective treatments.

4. Guidelines for local evaluation studies should include the following:

   --Recommendations that each evaluation report include a description of what actually happened to pupils involved in the program. Without such information it is impossible to reach a meaningful interpretation of any measures of change.

   --Encouragement to local projects to collect evidence of progress toward improved skills in reading and mathematics and obtain data regarding other outcomes of the particular methods employed, particularly on developing self-concept and interpersonal relations.

   --Encouragements to local education agencies to include in their evaluation procedures systematic attention to the selection or development of techniques designed to minimize cultural bias in tests and other data-collecting procedures used in evaluation.

5. Money saved by curtailing large-scale evaluations should support a national panel responsible for exploring and developing more responsive and effective alternative program evaluation models.

6. Research into alternative evaluation models should also be conducted to determine (a) the evaluation information the Congress, OE, other Federal agencies, and local agencies receiving Federal funds need and (b) whether adequate evaluation designs can be effectively implemented to meet these needs, and their cost.

7. Because of conflicts in the interpretation of off-the-shelf commercial standardized tests, only custom-designed tests should be used for federally sponsored large-scale program evaluation, when such large-scale evaluations are essential. The associated cost and effort to define program objectives and define measures of their effect should be part of the Federal agency's responsibility along with survey and analysis costs.

Other small working group conclusions and recommendations are shown in appendix IV.

In response to the conferee's recommendations, OE's Assistant Commissioner for Planning, Budgeting, and Evaluation said he agrees that there is a need for increased evaluation activity and capability at the State and local levels. He disagreed, however, that OE's nationally planned evaluations should be deemphasized.

CONCLUSIONS

As noted in chapter 5, Federal, State, and local education agencies frequently use standardized norm-referenced achievement tests to measure the effect of Federal education programs. However, there is a great deal of disagreement among testing experts and educators on the adequacy of these tests for their intended uses. Serious questions have been raised about the tests, and some organizations have called for a moratorium on their use and a higher priority on development and use of alternatives.

Although the tests' critics and defenders agree that certain problems exist, views differ greatly about the importance or severity of the problems and their remedies. Those who defend the tests and their continued use recognize that improvements are needed on such issues as test and test question bias; appropriate test norms; test selection, interpretation, and administration, including uses for program evaluation; and other issues.

Some questions raised about the adequacy of the tests have great importance in determining the appropriateness, validity, and proper conduct of educational program evaluations, including those that are federally funded. Decision-makers should be aware of these issues when using such information.

CHAPTER 7

PREFERENCES FOR EVIDENCE OF PROGRAM EFFECTIVENESS DIFFER

Responses to our questionnaire showed that State and local education agency officials responsible for administering Federal title I, III, and VII elementary and secondary education programs perceive important differences in the type of evidence of program effectiveness that Federal, State, and local officials prefer.

--Local education agency officials believe that State and OE officials are predominantly interested in standardized norm-referenced test scores for demonstrating program results. Local officials themselves prefer broader, more diverse types of information than only these test scores.

--State education agency officials prefer criterion-referenced tests. They favor less emphasis on standardized norm-referenced test results as evidence of program effectiveness than they believe OE officials want, but prefer them more than local agency officials do.

OE's Assistant Commissioner for Planning, Budgeting, and Evaluation believes that hard objective data on students' cognitive improvements is the centrally important information needed. He noted that this means gain scores on standardized norm-referenced achievement tests because these are most available.

As noted in chapter 5, State and local evaluations for titles I, III, and VII have been most often based on standardized norm-referenced tests. Therefore, evaluations usually have not reflected the kinds of results that State and local officials themselves prefer, but rather those that they believe would be likely to most impress higher level officials.

STATE AND LOCAL EDUCATION OFFICIALS BELIEVE STANDARDIZED TEST RESULTS MOST IMPRESS HIGHER LEVEL OFFICIALS

Legislative and other requirements for annual evaluations at the State and local levels of titles I, III, and VII of the Elementary and Secondary Education Act have several purposes, according to OE's Assistant Commissioner for Planning, Budgeting, and Evaluation. These include

--reporting on local project effectiveness or providing other data, on which local, State, and Federal officials can base programmatic, financial, and policy decisions; and

--providing data to State and/or Federal officials to select successful and exemplary projects for dissemination.

Educators must increasingly evaluate their instructional endeavors and present evidence which will permit others to judge their effectiveness. Through our questionnaire we have attempted to ascertain (1) what kinds of evidence of program effectiveness local officials administering federally supported elementary and secondary education programs think State and OE program officers expect, (2) what kinds of evidence of effectiveness State officials administering the programs think OE program officers expect, and (3) what types of evidence of effectiveness the State and local officials think is most useful to them.

Our questionnaire asked

--State program officials to rate, on a seven point scale, the types of information or findings which most impress them and, they believe, OE officials, as demonstrating program results and

--local project officials to rate on the same seven point scale the types of information or findings which most impress them and, they believe, OE or State officials as demonstrating program results.

As noted in chapter 5 (see pp. 43 to 44), only a few States employed statewide testing to evaluate their title I and III programs, and the great majority of these States used standardized norm-referenced tests. Most State evaluation reports for titles I and III were agregations of local education agency evaluation data. As shown on page 45, based on our questionnaire sample responses, local title I, III, and VII projects indicated overwhelming use of standardized norm-referenced tests--far greater than their use of criterion-referenced tests and all other tests.

State officials' views

The demonstration of program results should be an important factor in deciding to continue OE program funding. As the table below shows, State title I and III officials agreed on the types of program results they think are likely to impress OE officials most in this regard.

State officials overwhelmingly perceive OE officials to be most impressed by results obtained from standardized norm-referenced tests. Eighty-two percent of the State title I and 65 percent of the State title III officials responding ranked this category first. (See app. I for details.) State title I and III officials ranked results or improvements in educational management and accountability, as well as findings obtained from criterion-referenced tests, as either the second or third most impressive data for OE officials.

Titles I and III State Officials' Perceptions of What Impresses OE Officials and What Impresses State Officials (note a)

	Impresses OE		Impresses self	
	Title I	Title III	Title I	Title III
1. Improvement in educational management or accountability	3.1	3.9	4.0	4.5
2. Improvement in school services or facilities	6.0	6.1	5.9	6.1
3. Student improvements through gain scores or grades on teacher ratings	4.1	4.6	4.3	5.1
4. Student improvement through gain scores on standardized norm-referenced tests	1.3	1.6	2.5	3.3
5. Student improvement through gain scores on criterion-referenced tests	3.2	2.7	2.4	2.4
6. Student improvement through gains in the affective domain (e.g., likes, dislikes, interests, attitudes, motives, etc.)	5.3	4.4	3.7	3.1
7. Improvements in curriculum and instructional methods	4.5	4.5	3.8	3.4

a/The numbers shown are the respondents' average rankings of the alternatives given. Each respondent was asked to give the most impressive type of result a ranking of "1" and the next most impressive "2," etc.

State officials themselves appear to be impressed by slightly different types of data and information on program results. The table above shows that officials from titles I and III would be most impressed by gain scores on criterion-referenced tests. Although State title I officials ranked gain scores from norm-referenced tests almost equal to those from criterion-referenced tests, the title III respondents consider gains in the affective domain (for example, likes, dislikes, interests, attitudes, motives) as the second most important result, followed by gain scores from norm-referenced tests. State title I officials ranked gains in the affective domain third. Title I and III officials agreed on the remaining categories.

In general, State officials believe objective test results of program performance are most likely to impress both OE and State program officers. However, State respondents see themselves as more likely than OE program officials to be impressed by criterion-referenced test results and other factors cited above. State officials see themselves as more open than OE officials to various types of information demonstrating program results. At the same time, they agree with what they see as OE officials' view that impact evaluations based on test scores are the most impressive findings.

Emphasis on test scores for evidence of program effectiveness continues at the State and national levels. Reasons may include the following:

--Legislators and Federal and State officials are demanding evidence that the infusion of Federal and State dollars for special programs works.

--Test scores have traditionally been the only measure of effectiveness.

--Few alternatives to test scores exist and those that are available are unproven and not as widely accepted.

Local officials' views

The local title I and III respondents' perspectives are very nearly alike on what evidence of program results impresses State and OE officials. Title VII respondents' perspective is somewhat different; however, this may be at least partly because local title VII projects are responsible directly to OE program officers and not to State program officers.

The table below shows that local title I, III, and VII project officials feel that OE or State program officers are most impressed by norm-referenced test results.

Local Title I, III, and VII Officials' Perceptions of What Impresses State or OE Officials and What Impresses Local Officials (note a)

	Impresses OE or State			Impresses self		
	Title I	Title III	Title VII	Title I	Title III	Title VII
1. Improvement in educational management or accountability	3.9	3.8	3.8	4.7	4.5	4.4
2. Improvement in school services or facilities	5.2	5.1	4.8	4.9	4.9	4.8
3. Student improvements through gain scores or grades on teacher ratings	4.3	4.3	5.1	4.0	4.3	4.4
4. Student improvement through gain scores on standardized norm-referenced tests	2.2	2.6	2.1	3.7	3.7	3.4
5. Student improvement through gain scores on criterion-referenced tests	3.1	3.5	3.9	3.4	3.7	4.0
6. Student improvement through gains in the affective domain (e.g., likes, dislikes, interests, attitudes, motives, etc.)	4.6	4.2	4.4	3.3	3.3	3.4
7. Improvements in curriculum and instructional methods	4.2	3.9	3.7	3.2	3.0	3.2

a/The numbers shown are the respondents' average rankings of the given alternatives. Each respondent was asked to give the most impressive type of result a ranking of "1" and the next most impressive "2," etc.

Local title I and III project officials ranked criterion-referenced test results as the second most impressive data for OE or State officials, followed closely by improvements in educational management and accountability, and improvements in curriculum and instructional methods. Local title VII project officials, however, considered improvements in curriculum and instructional methods the second most impressive program result to OE, followed by improvements in educational management and accountability. Program results from criterion-referenced tests were ranked fourth.

Program results that impress local project officials are different from what they believe impresses OE or State program officers. Officials from all three local project types ranked improvement in curriculum and instructional methods as the most impressive program result. Local title I, III, and VII project officials consider gains in the affective domain the second most impressive program result, but with title VII, gain scores on norm-referenced tests also received the same ranking.

Concerning these results, (1) local title I project officials appear to consider results from criterion-referenced tests more impressive than norm-referenced test results, (2) local title III officials consider them equally impressive, and (3) local title VII officials clearly prefer norm- to criterion-referenced test results. In all cases, however, test results are not the most impressive program result to local project officials.

Since local project officials perceive results from improvements in curriculum and instructional methods and improvements in the affective domain as more meaningful to them than to State or OE officials, the extent to which such results are excluded from evaluations will probably reduce the adequacy of the evaluations and perhaps make them less useful to local officials. Generally, the degree to which local perceptions of what will most impress State or OE officials causes evaluations to emphasize test results, and educational management and accountability will also probably affect the adequacy and perhaps the usefulness of evaluations at the local level.

As with the State officials' perception of OE, local project officials generally believe OE or State program officers are most impressed by student outcome measures of program effectiveness, such as norm- and criterion-referenced tests. Local project officials themselves are considerably less impressed by these measures. They are more impressed by a variety of measures, but do not believe OE or State program officers fully share this interest.

Correspondingly, 51 percent of the local agency respondents and 77 percent of State agency respondents to our questionnaire stated that the educational community needs to greatly increase efforts to develop alternatives to the classic standardized norm-referenced tests.

Certain differences in questionnaire ratings among Federal, State, and local projects may be because of differing project objectives and priorities. However, local officials clearly do not regard test scores as the sole or most impressive criterion for determining program effectiveness. This may indicate a growing disenchantment with using standardized norm-referenced tests as program evaluation tools. Local officials are apparently interested in knowing how the projects as a whole are functioning and may see test measures as only one of several factors to be used in assessing individual and project performance.

CONCLUSIONS

Local and State evaluation reports on Federal elementary and secondary education program effectiveness are intended to provide information on which local, State, and Federal officials can base policy and program decisions. However, our questionnaire results show that State and local officials see important differences in the types of evidence of program effectiveness that they themselves and officials at other levels--Federal, State, and local--prefer. Therefore, better communication is needed among the three levels about the information they need to facilitate policy and program decisions at each level. The questionnaire results also raise this question: Should all three levels be served by a reporting system based on the same reports?

Although State officials view OE program officials as being most impressed by standardized norm-referenced test results, and local officials view State and OE officials in the same manner, State and local officials say that they are not most impressed by such results. Local officials prefer broader, more diverse information on program results than just these test scores and they are most impressed by improvements in curriculum and instructional methods and gains in the affective domain (likes, dislikes, interests, attitudes, motives, etc.). State officials are most impressed by results from criterion-referenced tests.

OE's Assistant Commissioner for Planning, Budgeting, and Evaluation believes that hard, objective data on students' cognitive improvements is the most important information needed. HE noted that this means gain scores on standardized norm-referenced achievement tests because these are most available.

The widespread use of standardized norm-referenced tests to evaluate State and local title I, III, and VII programs indicates that State and local officials have more frequently based their evaluations on the kinds of results they believe would be likely to most impress higher level officials than on their own preferences.

RECOMMENDATION TO THE SECRETARY OF HEW

In connection with the assessment recommended in chapter 4, we recommend that the Secretary direct OE to review the types of State and/or local program evaluation information collected (or planned to be collected) on programs authorized by titles I and VII of the Elementary and Secondary Education Act. The review should include an assessment of the information's usefulness at each level and should determine:

- --Whether it is realistic to attempt to serve Federal, State, and local levels with aggregated data based on local agency evaluation reports.
- --How the information needs at the local, State, and Federal levels can best be met.
- --Whether unnecessary duplication exists or will exist in meeting Federal information requirements through the State and local reporting systems as well as through OE national evaluations on these programs, and if so, how it should be eliminated.

During this review process, to define the evaluation information needed at State and local levels, OE should seek the views and cooperation of the State and local officials who are intended to use the results. 1/

1/HEW combined its comments on our recommendations for this chapter and chapter 4. For discussion of these comments, see "Agency comments and our evaluation" section on p. 37.

RESULTS OF GAO'S

STATE EDUCATION AGENCY QUESTIONNAIRE (note a)

	Number responding from 50 (note b)	Responses	
		Number	Percent (note c)
Section A: General			
1. How familiar are you with the research being conducted by the Center for the Study of Evaluation at the University of California at Los Angeles to evaluate the utility of many popular commercially available standardized norm-referenced tests? (note d) (Check the one response which best expresses your familiarity with the Center's research.)	50		
___Have little or no information		6	12.0
___Aware of the Center's work in test evaluation		14	28.0
___Read some of the Center's publications on the evaluation of norm-referenced tests		17	34.0
___Used the Center's material to assist in the selection of commercially available standardized norm-referenced tests		13	26.0
			100.0
2. How familiar are you with the Anchor Test Study conducted by the Educational Testing Service for the U.S. Office of Education (OE) to provide the ability to translate a child's score on any one of the eight most widely used standardized reading tests into a score on any of the other tests.	50		
___Have little or no information		3	6.0
___Aware of the Anchor Test Study		13	26.0
___Read the Anchor Test Study		25	50.0
___Used the Anchor Test Study		9	18.0
			100.0

3. From your experience, how great is the need, if any, to increase the effort by the educational community devoted to measurement and assessment techniques in any of the following areas? (Indicate your answer by checking the appropriate column for each of the seven line items listed below.) (notes b and e)

	Number responding from 50	Little or no increase		Some increase		Moderate increase		Substantial increase		Very great increase	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Development of methods for test design and construction	48	3	6.3	9	18.8	11	22.9	17	35.4	8	16.7
(2) Reduction of cultural, racial, and sexist biases in tests	49	3	6.1	10	20.4	11	22.4	15	30.6	10	20.4
(3) Development of alternatives to the classic standardized norm-referenced tests (e.g., criterion-referenced tests) (note f)	48	2	4.2	3	6.3	6	12.5	16	33.3	21	43.8
(4) Development of more and improved standardized norm-referenced tests	50	17	34.0	20	40.0	4	8.0	7	14.0	2	4.0
(5) Development and utilization of methods to better evaluate standardized norm-referenced tests in use	50	9	18.0	14	28.0	7	14.0	9	18.0	11	22.0
(6) Development and implementation of methods for the dissemination and utilization of assessment techniques for educational practitioners	46	1	2.2	0	0	4	8.7	14	30.4	27	58.7
(7) Other (please specify)	10	1	10.0	0	0	1	10.0	1	10.0	7	70.0

Section B: State title I programs

4. The demonstration of program results should be an important factor in the continuance of program funding from the Office of Education. Consider each of the following types of findings used to assess programs. FROM YOUR EXPERIENCE, which types of results do you think are more likely to impress OE program officers? Indicate your answer by rank ordering each of the following alternatives from the most to least impressive. Select the type of results which you think is most likely to impress an OE official. Rank this 1st. Do the same for all the remaining categories, ranking them 2nd, 3rd, 4th, 5th, 6th, and 7th. (notes b and e)

	Number responding from 50	1st		2nd		3rd		4th		5th		6th		7th	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Improvement in educational management or accountability	49	10	20.4	14	28.6	8	16.3	6	12.2	1	2.0	7	14.3	3	6.1
(2) Improvement in school services or facilities	49	0	0	2	4.1	2	4.1	4	8.2	5	10.2	9	18.4	27	55.1
(3) Student improvement through gain scores on grades or teacher ratings	49	2	4.1	4	8.2	11	22.4	13	26.5	10	20.4	5	10.2	4	8.2
(4) Student improvement through gain scores on standardized norm-referenced tests	49	40	81.6	5	10.2	3	6.1	0	0	1	2.0	0	0	0	0
(5) Student improvement through gain scores on criterion-referenced tests	49	2	4.1	18	36.7	13	26.5	6	12.2	7	14.3	2	4.1	1	2.0
(6) Student improvement through gains in the affective domain (e.g., likes, dislikes, interests, attitudes, motives, etc.)	49	0	0	3	6.1	2	4.1	9	18.4	10	20.4	15	30.6	10	20.4
(7) Improvements in curriculum and instructional methods	49	1	2.0	7	14.3	4	8.2	12	24.5	12	24.5	8	16.3	5	10.2

5. Regardless of the types of results which are likely to impress OE program officials, what types of results are likely to impress you, an educator? Indicate your answer by rank ordering each of the following alternatives with the same procedure used in the previous question (notes b and e)

	Number re-sponding from 50	1st		2nd		3rd		4th		5th		6th		7th	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
(1) Improvement in educational management or accountability	48	8	16.7	4	8.3	6	12.5	7	14.6	12	25.0	7	14.6	4	8.3
(2) Improvement in school services or facilities	49	1	2.0	1	2.0	2	4.1	4	8.2	5	10.2	12	24.5	24	49.0
(3) Student improvement through gain scores on grades or teacher ratings	48	5	10.4	2	4.2	10	20.8	9	18.8	8	16.7	9	18.8	5	10.4
(4) Student improvement through gain scores on standardized norm-referenced tests	48	20	41.7	10	20.8	9	18.8	3	6.3	0	0	2	4.2	4	8.3
(5) Student inprovement through gain scores on criterion-referenced tests	49	11	22.4	23	46.9	7	14.3	3	6.1	1	2.0	4	8.2	0	0
(6) Student improvement through gains in the affective domain (i.e. likes, dislikes, interests, attitudes, motives, etc.)	49	6	12.2	7	14.3	8	16.3	12	24.5	10	20.4	2	4.1	4	8.2
(7) Improvements in curriculum and instructional methods	49	8	16.3	5	10.2	8	16.3	10	20.4	8	16.3	8	16.3	2	4.1

	Number responding from 50 (note b)	Responses Number	 Percent (note c)
6. Which of the following techniques did your State employ for its 1973-74 evaluation of title I? (Check all that apply.)	48		
___Aggregation and analysis of data from local education agency reports		45	93.8
___Educational audits and their results		9	18.8
___Statewide testing of title I students		11	22.9
___Other (please specify)		5	10.4
Note: If your State did not test title I students statewide, skip questions 7 and 8.			
7. Which of the following types of tests did your State administer for its title I evaluation?	26		
___Standardized norm-referenced tests (note d)		21	80.8
___Criterion-referenced tests (note f)		3	11.5
___Other tests (please specify)		4	15.4
If you do not use standardized norm-referenced tests, skip question 8. If you do, continue.			
8. How did you report the results for the standardized norm-referenced testing?	28		
___Raw scores		2	7.1
___Grade equivalents		24	85.7
___Percentiles		6	21.4
___Quartiles		1	3.6
___Stanines		4	14.3
___Other (please specify)		2	7.1

NOTE: In the following five questions you will be asked to rate several aspects of the Elementary and Secondary Education Act, title I, local and State evaluation reports that affect the degree to which these documents satisfy your policy, management and programmatic information needs. You are asked to provide overall judgments on the adequacy of the quality, informational content, and utility of the evaluation reports. Do this by considering each of these attributes: very deficient, deficient, marginal, adequate, and more than adequate. Check the box which most appropriately reflects how you feel about the respective local and State evaluations with regard to the particular aspects in question.

9. Rate the FOCUS AND SCOPE of the local and State evaluation reports (notes b and e)

(Focus and Scope: the adequacy with which the report covers the essential and related material and the appropriateness of the emphasis and treatment given to the relevant topics, details, and high and lower priority information). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	48	0	0	5	10.4	19	39.6	23	47.9	1	2.1
State reports	48	0	0	4	8.3	16	33.3	25	52.1	3	6.3

10. Rate the local and State evaluation reports on THE PRESENTATION OF REQUIRED MANAGEMENT INFORMATION NEEDS (notes b and e)

(Presentation of Required Management Information Needs: the extent to which the report presents the information needed to evaluate and update current policies by those who transfer policy decisions into plans, budgets, program implementation, operational oversight, resource allocations, forecasts, status assessments and reports, educational accountability, costs, benefits and efficiency assessments). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	49	2	4.1	7	14.3	26	53.1	14	28.6	0	0
State reports	49	1	2.0	6	12.2	22	44.9	18	36.7	2	4.1

11. Rate the local and State evaluation reports on the adequacy with which they properly QUALIFY FINDINGS (notes b and e)

(Qualification of Findings: the extent to which the report properly qualifies the findings and assumptions and identifies those conditions and situations where the findings are not applicable.) (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Per cent	Number	Percent
Local reports	49	3	6.1	11	22.4	20	40.8	14	28.6	1	2.0
State reports	49	2	4.1	8	16.3	13	26.5	24	49.0	2	4.1

12. Rate the local and State evaluation reports on the CREDIBILITY OF FINDINGS (notes b and e)

(Credibility of Findings: the degree of confidence expressed in the findings through statements of statistical certainty, soundness of method, evidence of replication, consensual agreements, similar experiences, supporting expert judgment and opinions, and reasonableness of assumptions). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Per cent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	49	4	8.2	12	24.5	17	34.7	15	30.6	1	2.0
State reports	49	2	4.1	10	20.4	17	34.7	18	36.7	2	4.1

13. Rate the local and State evaluation reports on the adequacy of the QUALIFICATION AND QUANTIFICATION OF MEASUREMENT DATA (notes b and e)

(Qualification and Quantification of Measurement Data: the extent to which the evaluation assessments can be qualified and quantified into measurable attributes and parameters that address the problem in measurable, operational, or concrete terms). (Check one box in each row.)

	Number re-sponding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	49	2	4.1	7	14.3	19	38.8	19	38.8	2	4.1
State reports	49	2	4.1	4	8.2	22	44.9	17	34.7	4	8.2

14. How often do your Elementary and Secondary Education Act, title I, local and State program evaluations adequately report information on the needs assessment, number of children, per pupil expenditure, project achievement, and pupil benefit parameters? (Check one box in each row for both local and State evaluations.) (notes b and e)

Local reports	Number re-sponding from 50	Very often		Generally		As often as not		Occasionally		Seldom	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Information on the manner in which the needs of children are assessed	46	15	32.6	18	39.1	1	2.2	9	19.6	3	6.5
(2) Information on the number of children in the program	46	30	65.2	12	26.1	3	6.5	1	2.2	0	0
(3) Per pupil expenditures of each program	46	15	32.6	16	34.8	5	10.9	4	8.7	6	13.0
(4) Evidence of qualifiable or measurable achievements	46	13	28.3	23	50.0	6	13.0	4	8.7	0	0
(5) Evidence of qualifiable or measurable pupil benefits	46	9	19.6	19	41.3	11	23.9	7	15.2	0	0

State reports	Number re-sponding from 50	Very often		Generally		As often as not		Occa-sionally		Seldom	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
(1) Information on the manner in which the needs of children are assessed	44	11	25.0	19	43.2	3	6.8	7	15.9	4	9.1
(2) Information on the number of children in the program	45	29	64.4	11	24.4	3	6.7	2	4.4	0	0
(3) Per pupil expenditures of each program	44	17	38.6	18	40.9	4	9.1	1	2.3	4	9.1
(4) Evidence of qualifiable or measurable achievements	45	16	35.6	18	40.0	8	17.8	2	4.4	1	2.2
(5) Evidence of qualifiable or measurable pupil benefits	45	11	24.4	18	40.0	8	17.8	8	17.8	0	0

Section C: State title III programs

15. The demonstration of program results should be an important factor in the continuance of program funding from the Office of Education. Consider each of the following types of findings used to assess programs. FROM YOUR EXPERIENCE, which types of results do you think are more likely to impress OE program officers? Indicate your answer by rank ordering each of the following alternatives from the most to least impressive. Select the type of results which you think is most likely to impress an OE official. Rank this 1st. Do the same for all the remaining categories, ranking them 2nd, 3rd, 4th, 5th, 6th and 7th. (notes b and e)

	Number re-spond-ing from 50	1st		2nd		3rd		4th		5th		6th		7th	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
(1) Improvement in educational management or accountability	49	8	16.3	5	10.2	6	12.2	5	10.2	15	30.6	8	16.3	2	4.1
(2) Improvement in school services or facilities	48	1	2.1	2	4.2	1	2.1	4	8.3	2	4.2	8	16.7	30	62.5
(3) Student improvement through gain scores on grades or teacher ratings	47	0	0	1	2.1	12	25.5	14	29.8	6	12.8	4	8.5	10	21.3
(4) Student improvement through gain scores on standardized norm-referenced tests	48	31	64.6	10	20.8	5	10.4	1	2.1	1	2.1	0	0	0	0
(5) Student improvement through gain scores on criterion-referenced tests	48	8	16.7	19	39.6	9	18.8	7	14.6	2	4.2	3	6.3	0	0
(6) Student improvement through gains in the affective domain (e.g., likes, dislikes, interests, attitudes, motives, etc.)	49	0	0	5	10.2	10	20.4	11	22.4	11	22.4	8	16.3	4	8.2
(7) Improvements in curriculum and instructional methods	46	2	4.3	6	13.0	7	15.2	4	8.7	10	21.7	12	26.1	5	10.9

16. Regardless of the types of results which are likely to impress OE program officials, what types of results are likely to impress you, an educator? Indicate your answer by rank ordering each of the following alternatives with the same procedure used in the previous question. (notes b and e)

	Number responding from 50	1st		2nd		3rd		4th		5th		6th		7th	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Improvement in educational management or accountability	48	3	6.3	2	4.2	9	18.8	9	18.8	9	18.8	12	25.0	4	8.3
(2) Improvement in school services or facilities	47	0	0	2	4.3	1	2.1	2	4.3	6	12.8	10	21.3	26	55.3
(3) Student improvement through gain scores on grades or teacher ratings	48	0	0	5	10.4	3	6.3	11	22.9	6	12.5	9	18.8	14	29.2
(4) Student improvement through gain scores on standardized norm-referenced tests	47	12	25.5	7	14.9	8	17.0	6	12.8	6	12.8	5	10.6	3	6.4
(5) Student improvement through gain scores on criterion-referenced tests	48	20	41.7	11	22.9	5	10.4	6	12.5	3	6.3	3	6.3	0	0
(6) Student improvement through gains in the affective domain (e.g., likes, dislikes, interests, attitudes, motives, etc.)	48	3	6.3	15	31.3	16	33.3	6	12.5	6	12.5	2	4.2	0	0
(7) Improvements in curriculum and instructional methods	48	9	18.8	9	18.8	6	12.5	7	14.6	10	20.8	7	14.6	0	0

	Number responding from 50 (note b)	Responses Number	Responses Percent (note c)
17. Which of the following techniques did your State employ for its 1973-74 evaluation of title III? (Check all that apply.)	48		
___Aggregation and analysis of data from local education agency reports		41	85.4
___Educational audits and their results		27	56.3
___Statewide testing of title III students		5	10.4
___Other (please specify)		12	25.0

Note: If your State did not test title III students statewide, skip questions 18 and 19.

	Number responding from 50 (note b)	Responses Number	Responses Percent (note c)
18. Which of the following types of tests did your State administer for its title III evaluation?	14		
___Standardized norm-referenced tests (note d)		9	64.3
___Criterion-referenced tests (note f)		8	57.1
___Other tests (please specify)		7	50.0

If you do not use standardized norm-referenced tests, skip question 19. If you do, continue.

	Number responding from 50 (note b)	Responses Number	Responses Percent (note c)
19. How did you report results for the standardized norm-referenced tests?	10		
___Raw scores		2	20.0
___Grade equivalents		7	70.0
___Percentiles		4	40.0
___Quartiles		2	20.0
___Stanines		5	50.0
___Other (please specify)		2	20.0

NOTE: In the following five questions you will be asked to rate several aspects of the Elementary and Secondary Education Act, title III, local and State evaluation reports that affect the degree to which these documents satisfy your policy, management and programmatic information needs. You are asked to provide overall judgments on the adequacy of the quality, informational content, and utility of the evaluation reports. Do this by considering each of these attributes: very deficient, deficient, marginal, adequate, and more than adequate. Check the box which most appropriately reflects how you feel about the respective local and State evaluations with regard to the particular aspects in question.

20. Rate the FOCUS AND SCOPE of the local and State evaluation reports (notes b and e)

(Focus and Scope: the adequacy with which the report covers the essential and related material and the appropriateness of the emphasis and treatment given to the relevant topics, details, and high and lower priority information). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	48	1	2.1	2	4.2	16	33.3	27	56.3	2	4.2
State reports	46	1	2.2	5	10.9	14	30.4	25	54.3	1	2.2

21. Rate the local and State evaluation reports on THE PRESENTATION OF REQUIRED MANAGEMENT INFORMATION NEEDS (notes b and e)

(Presentation of Required Management Information Needs: the extent to which the report presents the information needed to evaluate and update current policies by those who transfer policy decisions into plans, budgets, program implementation, operational oversight, resource allocations, forecasts, status assessments and reports, educational accountability, costs, benefits, and efficiency assessments). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	48	2	4.2	4	8.3	21	43.8	19	39.6	2	4.2
State reports	45	3	6.7	1	2.2	14	31.1	26	57.8	1	2.2

22. Rate the local and State evaluation reports on the adequacy with which they properly QUALIFY FINDINGS (notes b and e)

(Qualification of Findings: the extent to which the report properly qualifies the findings and assumptions and identifies those conditions and situations where the findings are not applicable). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	48	1	2.1	7	14.6	21	43.8	17	35.4	2	4.2
State reports	47	3	6.4	3	6.4	16	34.0	23	48.9	2	4.3

23. Rate the local and State evaluation reports on the CREDIBILITY OF FINDINGS (notes b and e)

(Credibility of Findings: the degree of confidence expressed in the findings through statements of statistical certainty, soundness of method, evidence of replication, consensual agreements, similar experiences, supporting expert judgment and opinions, and reasonableness of assumptions). (Check one box in each row.)

	Number respond ing from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	48	1	2.1	4	8.3	24	50.0	17	35.4	2	4.2
State reports	47	1	2.1	3	6.4	15	31.9	24	51.1	4	8.5

24. Rate the local and State evaluation reports on the adequacy of the QUALIFICATION AND QUANTIFICATION OF MEASUREMENT DATA (notes b and e)

(Qualification and Quantification of Measurement Data: the extent to which the evaluation assessments can be qualified and quantified into measurable attributes and parameters that address the problem in measurable, operational, or concrete terms). (Check one box in each row.)

	Number responding from 50	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	48	0	0	7	14.6	21	43.8	19	39.6	1	2.1
State reports	47	1	2.1	3	6.4	22	46.8	19	40.4	2	4.3

25. How often do your Elementary and Secondary Education Act, title III, local and State program evaluations adequately report information on the needs assessment, number of children, per pupil expenditure, project achievement, and pupil benefit parameters? (Check one box in each row for both local and State evaluations.) (notes b and e)

Local reports	Number responding from 50	Very often		Generally		As often as not		Occasionally		Seldom	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Information on the manner in which the needs of children are assessed	47	9	19.1	22	46.8	8	17.0	4	8.5	4	8.5
(2) Information on the number of children in the program	47	33	70.2	9	19.1	4	8.5	0	0	1	2.1
(3) Per pupil expenditures of each program	47	19	40.4	14	29.8	4	8.5	6	12.8	4	8.5
(4) Evidence of qualifiable or measurable achievements	47	14	29.8	18	38.3	11	23.4	3	6.4	1	2.1
(5) Evidence of qualifiable or measurable pupil benefits	47	10	21.3	19	40.4	11	23.4	6	12.8	1	2.1

State reports	Number responding from 50	Very often Number	Very often Percent	Generally Number	Generally Percent	As often as not Number	As often as not Percent	Occasionally Number	Occasionally Percent	Seldom Number	Seldom Percent
(1) Information on the manner in which the needs of children are assessed	40	4	10.0	18	45.0	7	17.5	6	15.0	5	12.5
(2) Information on the number of children in the program	40	21	52.5	13	32.5	4	10.0	1	2.5	1	2.5
(3) Per pupil expenditures of each program	40	12	30.0	13	32.5	5	12.5	8	20.0	2	5.0
(4) Evidence of qualifiable or measurable achievements	39	8	20.5	15	38.5	11	28.2	2	5.1	3	7.7
(5) Evidence of qualifiable or measurable pupil benefits	40	6	15.0	14	35.0	10	25.0	5	12.5	5	12.5

a/We requested that the questionnaire be completed by State officials familiar with the State's evaluation efforts conducted for Elementary and Secondary Education Act, titles I (regular, migrant, neglected, and delinquent, etc.) and III, and the State's own assessment efforts. The questionnaire was divided into three sections: section A, National Assessment of Educational Progress and statewide assessment; section B, Elementary and Secondary Education Act, title I evaluation efforts; and section C, title III evaluation efforts. We suggested that the questionnaire be taken apart and distributed to persons most familiar with each part, such as the State director of research, planning, and evaluation for section A, the State director of title I for section B, and the State director of title III for section C. Some of the questions from the questionnaire have been omitted from this report. Questions pertaining to the National Assessment of Educational Progress and statewide assessments are shown in GAO's report to the Congress (HRD-76-113), dated July 20, 1976.

b/In April 1975 we sent the questionnaire to the education agencies in all States and the District of Columbia. By June 1975 the District of Columbia and all but one State responded. For purposes of compiling responses to the questionnaire, the District of Columbia is considered to be a State.

c/This column shows the percentage of respondents to the question that chose each specific answer.

d/Standardized norm-referenced tests are tests which purport to assess the individual student's ability or achievement in broad subject areas as compared to the rest of the test population (e.g., the Metropolitan Achievement Test (MAT) or the Wechsler Intelligence Scale for Children (WISC)).

e/The percent columns show the percentage of respondents to each line item that chose each category. Where the percentages on each line do not add to 100, it is due to rounding.

f/Criterion-referenced tests are tests specificially constructed to measure students' attainment of specific educational objectives or proficiency with specified curriculum material. These tests, which may be standardized, usually provide a specific and operational description of the level and type of task performance or behavioral measures used as a criterion to indicate attainment of the educational objectives. For example, the student must be able to compute the correct product of all single digit numerals greater than zero with no more than five errors.

RESULTS OF GAO'S

LOCAL EDUCATION AGENCY QUESTIONNAIRE (note a)

	Number of projected responses from 8,936 (note b)	Responses	
		Number (note b)	Percent (note c)
Section A: To be completed by questionnaire respondents from all local education agencies sampled			
1. How familiar are you with the research being conducted at the Center for the Study of Evaluation at the University of California at Los Angeles to evaluate the utility of many popular commercially available standardized norm-referenced tests? (note d) (Check the one response which best expresses your familiarity with the Center's research.)	5,987		
___Have little or no information		5,059	84.5
___Aware of the Center's work in test evaluation		601	10.0
___Read some of the Center's publications on the evaluation of norm-referenced tests		192	3.2
___Used the Center's material to assist in the selection of commercially available standardized norm-referenced tests		135	2.3
			100.0
2. How familiar are you with the Anchor Test Study conducted by the Educational Testing Service for the U.S. Office of Education (OE) to provide the ability to translate a child's score on any one of the eight most widely used standardized reading tests into a score on any of the other tests?	282		
___Have little or no information		282	100.0
___Aware of the Anchor Test Study		-	-
___Read the Anchor Test Study		-	-
___Used the Anchor Test Study		-	-
			100.0

3. From your experience, how great is the need, if any, to increase the effort by the educational community devoted to measurement and assessment techniques in any of the following areas? (Indicate your answer by checking the appropriate column for each of the seven line items listed below.) (notes b and e)

	Projected number re-sponding from 8,936	Little or no increase		Some increase		Moderate increase		Substantial increase		Very great increase	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
(1) Development of methods for test design and construction	7,410	1,801	24.3	1,645	22.2	1,457	19.7	1,495	20.2	1,012	13.7
(2) Reduction of cultural, racial, and sexist biases in tests	7,398	2,241	30.3	1,321	17.9	1,256	17.0	1,465	19.8	1,116	15.1
(3) Development of alternatives to the classic standardized norm-referenced tests (e.g., criterion-referenced tests) (note g)	8,028	1,477	18.4	1,296	16.1	1,195	14.9	2,139	26.6	1,922	23.9
(4) Development of more and improved standardized norm-referenced tests	8,019	2,097	26.2	1,600	19.9	2,145	26.7	1,303	16.3	874	10.9
(5) Development and utilization of methods to better evaluate standardized norm-referenced tests in use	8,001	1,149	14.4	1,590	19.9	1,853	23.2	1,959	24.5	1,450	18.1
(6) Development of methods for the dissemination and utilization of assessment techniques	8,026	886	11.0	1,180	14.7	1,332	16.6	2,243	27.9	2,385	29.7
(7) Other (please specify)	328	44	13.4	0	0	0	0	76	23.2	208	63.4

Section B: Complete this section only if you have a funded title I program.

4. The demonstration of program results should be an important factor in the continuance of program funding from the Office of Education. Consider each of the following types of findings used to assess programs. FROM YOUR EXPERIENCE, which types of results do you think are more likely to impress OE or State education agency program officers. Indicate your answer by rank ordering each of the following alternatives from the most to least impressive. Select the type of results which you think is most likely to impress OE or State education agency officials. Rank this 1st. Do the same for all the remaining categories, ranking them 2nd, 3rd, 4th, 5th, 6th, and 7th. (Notes b and e)

	Projected number responding from 8,936	1st		2nd		3rd		4th		5th		6th		7th	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Improvement in educational management or accountability	8,481	1,487	17.5	1,089	12.8	1,231	14.5	1,083	12.8	1,492	17.6	983	11.6	1,116	13.2
(2) Improvement in school services or facilities	8,481	290	3.4	481	5.7	781	9.2	1,135	13.4	1,426	16.8	1,972	23.2	2.397	28.3
(3) Student improvement through gain scores on grades or teacher ratings	8,543	479	5.6	1,057	12.4	1,591	18.6	1,802	21.1	970	11.3	1,322	15.5	1,324	15.5
(4) Student improvement through gain scores on standardized norm-referenced tests	8,564	4,595	53.6	1,437	16.8	844	9.9	653	7.6	473	5.5	298	3.5	266	3.1
(5) Student improvement through gain scores on criterion-referenced tests	8,477	1,301	15.3	2,758	32.5	1,675	19.8	671	7.9	1,021	12.0	657	7.8	394	4.6
(6) Student improvement through gains in the affective domain (i.e., likes, dislikes, interests, attitudes, motives, etc.)	8.521	382	4.5	701	8.2	1,642	19.3	1,438	16.9	1,054	12.4	1,363	16.0	1.941	22.8
(7) Improvements in curriculum and instructional methods	8,529	784	9.2	1,029	12.1	1,003	11.8	1,800	21.1	1,745	20.5	1,408	16.5	761	8.9

5. Regardless of the types of results which are likely to impress OE or State education agency program officials, what types of results are likely to impress you, an educator? Indicate your answer by rank ordering each of the following alternatives with the same procedure used in the previous question. (notes b and e)

	Projected number re-sponding from 8,936	1st		2nd		3rd		4th		5th		6th		7th	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
(1) Improvement in educational management or accountability	8,489	685	8.1	1,014	11.9	853	10.0	1,120	13.2	1,132	13.3	1,420	16.7	2,266	26.7
(2) Improvement in school services or facilities	8,508	604	7.1	471	5.5	1,126	13.2	897	10.5	1,481	17.4	2,036	23.9	1,892	22.2
(3) Student improvement through gain scores on grades or teacher ratings	8,491	880	10.4	1,215	14.3	1,431	16.9	1,601	18.9	1,414	16.6	1,165	13.7	786	9.3
(4) Student improvement through gain scores on standardized norm-referenced tests	8,526	1,661	19.5	1,557	18.3	1,009	11.8	1,111	13.0	1,192	14.0	889	10.4	1,108	13.0
(5) Student improvement through gain scores on criterion-referenced tests	8,505	2,073	24.4	1,438	16.9	1,202	14.1	1,327	15.6	746	8.8	946	11.1	774	9.1
(6) Student improvement through gains in the affective domain (i.e., likes, dislikes, interests, attitudes, motives, etc.)	8,515	1,725	20.3	1,833	21.5	1,381	16.2	1,428	16.8	704	8.3	652	7.7	792	9.3
(7) Improvements in curriculum and instructional methods	8,492	1,745	20.6	1,934	22.8	1,487	17.5	913	10.7	1,381	16.3	792	9.3	240	2.8

	Number of projected responses from 8,936 (note b)	Responses	
		Number (note b)	Percent (note c)
6. Are your local evaluations of federally funded programs usually performed by external or internal evaluators? (Check one.)	8,205		
___Internal (e.g., local education agency staff)		5,468	66.6
___External (e.g., consultants)		494	6.0
___Both		2,243	27.3
			100.0 f/
7. Which of the following types of tests did your local education agency administer for its title I evaluation? If your local education agency did not test title I students, skip questions 7 and 8.	8,583		
___Standardized norm-referenced tests (note d)		8,103	94.4
___Criterion-referenced tests (note g)		2,110	24.6
___Other tests (please specify)		1,168	13.6
If you do not employ standardized norm-referenced tests, skip question 8. If you do, continue.			
8. How did you report the results for the standardized norm-referenced testing?	8,029		
___Raw scores		1,792	22.3
___Grade equivalents		6,658	82.9
___Percentiles		2,979	37.1
___Quartiles		528	6.6
___Stanines		946	11.8
___Other (please specify)		163	2.0

NOTE: In the following five questions you will be asked to rate several aspects of the Elementary and Secondary Education Act, title I, local and State evaluation reports that affect the degree to which these documents satisfy your policy, management, and programmatic information needs. You are asked to provide overall judgments on the adequacy of the quality, informational content, and utility of the evaluation reports. Do this by considering each of these attributes: very deficient, deficient, marginal, adequate, and more than adequate. Check the box which most appropriately reflects how you feel about the respective local and State evaluations with regard to the particular aspects in question.

9. Rate the FOCUS AND SCOPE of the local and State evaluation report. (notes b and e)

(Focus and Scope: the adequacy with which the report covers the essential and related material and the appropriateness of the emphasis and treatment given to the relevant topics, details, and high and lower priority information). (Check one box in each row)

	Projected number responding from 8,936	Very deficient Number	Very deficient Percent	Deficient Number	Deficient Percent	Marginal Number	Marginal Percent	Adequate Number	Adequate Percent	More than adequate Number	More than adequate Percent
Local reports	8,510	45	0.5	426	5.0	2,097	24.6	4,521	53.1	1,422	16.7
State reports	8,350	196	2.3	733	8.8	2,248	26.9	4,098	49.1	1,076	12.9

10. Rate the local and State evaluation reports on the PRESENTATION OF REQUIRED MANAGEMENT INFORMATION NEEDS. (notes b and e)

(Presentation of Required Management Information Needs: the extent to which the report presents the information needed to evaluate and update policies by those who transfer policy decisions into plans, budgets, program implementation, curriculum, operational oversight, resource allocations, forecasts, status assessments and reports, educational accountability, costs, benefits, and efficiency assessments). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient Number	Very deficient Percent	Deficient Number	Deficient Percent	Marginal Number	Marginal Percent	Adequate Number	Adequate Percent	More than adequate Number	More than adequate Percent
Local reports	8,635	119	1.4	484	5.6	2,782	32.2	4,037	46.7	1,212	14.0
State reports	8,486	312	3.7	863	10.2	2,879	33.9	3,313	39.0	1,119	13.2

11. Rate the local and State evaluation reports on the adequacy with which they properly QUALIFY FINDINGS. (notes b and e)

(Qualification of Findings: the extent to which the report properly qualifies the findings and assumptions and identifies those conditions and situations where the findings are not applicable). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	8,518	217	2.5	518	6.1	2,759	32.4	4,173	49.0	852	10.0
State reports	8,347	451	5.4	709	8.5	2,978	35.7	3,503	42.0	706	8.5

12. Rate the local and State evaluation reports on the CREDIBILITY OF FINDINGS (notes b and e)

(Credibility of Findings: the degree of confidence expressed in the findings through statements of statistical certainty, soundness of method, evidence of replication, consensual agreements, similar experiences, supporting expert judgment and opinions, and reasonableness of assumptions). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	8,552	277	3.2	546	6.4	2,403	28.1	4,472	52.3	854	10.0
State reports	8,391	616	7.3	779	9.3	2,356	28.1	3,957	47.2	684	8.1

13. Rate the local and State evaluation reports on the adequacy of the QUALIFICATION AND QUANTIFICATION OF MEASUREMENT DATA. (Notes b and e)

(Qualification and Quantification of Measurement Data: the extent to which the evaluation assessments can be qualified and quantified into measurable attributes and parameters that address the problem in measurable, operational, or concrete terms). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	8,522	167	2.0	1,071	12.6	2,524	29.6	4,036	47.4	724	8.5
State reports	8,369	298	3.6	932	11.1	2,844	34.0	3,580	42.8	716	8.6

14. How often do your Elementary and Secondary Education Act, title I, local program evaluations adequately report information on the need assessment, number of children, per pupil expenditure, project achievement, and pupil benefit parameters? (Check one box in each row.) (notes b and e)

	Projected number responding from 8,936	Very often		Generally		As often as not		Occasionally		Seldom	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Information on the manner in which the needs of children are assessed	8,435	3,034	36.0	3,986	47.3	469	5.6	792	9.4	155	1.8
(2) Information on the number of children in the program	8,422	4,686	55.6	2,692	32.0	415	4.9	474	5.6	156	1.8
(3) Per pupil expenditures of each program	8,242	2,653	32.2	3,144	38.1	801	9.7	1,094	13.3	550	6.7
(4) Evidence of qualifiable and measurable achievements	8,435	2,887	34.2	3,973	47.1	999	11.8	498	5.9	79	0.9
(5) Evidence of qualifiable or measurable pupil benefits	8,331	2,398	28.8	4,324	51.9	829	10.0	633	7.6	146	1.8

15. From your experience, how often can you draw comparisons between the results of your local Federal program and Federal programs in other localities from State and Federal evaluation reports? (Check one box for each type of report.) (notes b and e)

	Projected number re-sponding from 8,936	Very often		Generally		As often as not		Occa-sionally		Seldom		No basis to judge	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
State reports	8,448	629	7.4	1,799	21.3	896	10.6	1,391	16.5	1,852	21.9	1,882	22.3
Federal reports	8,435	258	3.1	1,124	13.3	771	9.1	1,493	17.7	2,316	27.5	2,475	29.3

Section C: Complete this section only if you have a funded title II program.

16. The demonstration of program results should be an important factor in the continuance of program funding from the Office of Education. Consider each of the following types of findings used to assess programs. FROM YOUR EXPERIENCE, which types of results do you think are more likely to impress OE or State education agency program officers? Indicate your answer by rank ordering each of the following alternatives from the most to least impressive. Select the type of results which you think is most likely to impress OE or State education agency officials. Rank this 1st. Do the same for all the remaining categories, ranking them 2nd, 3rd, 4th, 5th, 6th and 7th. (notes b and e)

	Projected number responding from 8,936	1st		2nd		3rd		4th		5th		6th		7th	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Improvement in educational management or accountability	2,605	497	19.1	279	10.7	307	11.8	420	16.1	508	19.5	349	13.4	244	9.4
(2) Improvement in school services or facilities	2,554	127	5.0	186	7.3	288	11.3	260	10.2	370	14.5	510	20.0	813	31.8
(3) Student improvement through gain scores on grades or teacher ratings	2,606	237	9.1	298	11.4	433	16.6	352	13.5	499	19.2	387	14.8	401	15.4
(4) Student improvement through gain scores on standardized norm-referenced tests	2,612	1,168	44.7	537	20.5	149	5.7	285	10.9	105	4.0	150	5.8	219	8.4
(5) Student improvement through gain scores on criterion-referenced tests	2,611	148	5.7	884	33.9	627	24.0	172	6.6	136	5.2	435	16.7	208	8.0
(6) Student improvement through gains in the affective domain (e.g., likes, dislikes, interests, attitudes, motives, etc.)	2,612	209	8.0	261	10.0	490	18.7	569	21.8	393	15.0	200	7.6	492	18.8
(7) Improvements in curriculum and instructional methods	2,606	447	17.1	252	9.7	269	10.3	487	18.7	525	20.1	501	19.2	126	4.8

17. Regardless of the types of results which are likely to impress OE or State education agency program officials, what types of results are likely to impress you, an educator? Indicate your answer by rank ordering each of the following alternatives with the same procedure used in the previous question. (notes b and e)

	Projected number responding from 8,936	1st		2nd		3rd		4th		5th		6th		7th	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Improvement in educational management or accountability	2,609	337	12.9	253	9.7	346	13.2	299	11.5	263	10.1	455	17.4	657	25.2
(2) Improvement in school services or facilities	2,602	183	7.0	149	5.7	421	16.2	246	9.4	286	11.0	735	28.2	583	22.4
(3) Student improvement through gain scores on grades or teacher ratings	2,587	283	11.0	224	8.7	293	11.3	437	16.9	638	24.7	479	18.5	234	9.0
(4) Student improvement through gain scores on standardized norm-referenced tests	2,597	697	26.8	255	9.8	227	8.7	451	17.4	216	8.3	425	16.4	327	12.6
(5) Student improvement through gain scores on criterion-referenced tests	2,579	309	12.0	663	25.7	438	17.0	262	10.2	354	13.7	170	6.6	382	14.8
(6) Student improvement through gains in the affective domain (i.e., likes, dislikes, interests, attitudes, motives, etc.)	2,568	469	18.3	509	19.8	551	21.4	448	17.4	195	7.6	163	6.3	234	9.1
(7) Improvements in curriculum and instructional methods	2,594	711	27.4	576	22.2	298	11.5	390	15.1	364	14.0	195	7.5	59	2.3

	Number of projected responses from 8,936 (note b)	Responses Number (note b)	 Percent (note c)
18. Are your local evaluations of federally funded programs usually performed by external or internal evaluators? (Check one.)	2,623		
___Internal (e.g., local education agency staff)		1,445	55.1
___External (e.g., consultants)		392	14.9
___Both		786	30.0
			100.0
19. Which of the following types of tests did your local education agency administer for its title III evaluation? If your local education agency did not test title III students, skip questions 19 and 20.	1,745		
___Standardized norm-referenced tests (note d)		1,380	79.1
___Criterion-referenced tests (note g)		424	24.3
___Other tests (please specify)		515	29.5
If you do not employ standardized norm-referenced tests, skip question 20. If you do, continue.			
20. How did you report the results for the standardized norm-referenced testing?	1,319		
___Raw scores		400	30.3
___Grade equivalents		981	74.4
___Percentiles		765	58.0
___Quartiles		73	5.5
___Stanines		283	21.5
___Other (please specify)		64	4.8

NOTE: In the following five questions you will be asked to rate several aspects of the Elementary and Secondary Education Act, title III, local and State evaluation reports that affect the degree to which these documents satisfy your policy, management, and programmatic information needs. You are asked to provide overall judgments on the adequacy of the quality, informational content, and utility of the evaluation reports. Do this by considering each of these attributes: very deficient, deficient, marginal, adequate, and more than adequate. Check the box which most appropriately reflects how you feel about the respective local and State evaluations with regard to the particular aspects in question.

21. Rate the FOCUS AND SCOPE of the local and State evaluation reports. (notes b and e)

(Focus and Scope: the adequacy with which the report covers the essential and related material and the appropriateness of the emphasis and treatment given to the relevant topics, details, and high and lower priority information). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	2,463	35	1.4	44	1.8	531	21.6	1,396	56.7	458	18.6
State reports	2,411	16	0.6	162	6.7	607	25.2	1,221	50.6	405	16.8

22. Rate the local and State evaluation reports on the PRESENTATION OF REQUIRED MANAGEMENT INFORMATION NEEDS. (notes b and e)

(Presentation of Required Management Information Needs: the extent to which the report presents the information needed to evaluate and update policies by those who transfer policy decisions into plans, budgets, program implementation, curriculum, operational oversight, resource allocations, forecasts, status assessments and reports, educational accountability, costs, benefits, and efficiency assessments). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	2,471	58	2.3	147	5.9	558	22.6	1,333	53.9	376	15.2
State reports	2,420	45	1.9	204	8.4	672	27.8	1,132	46.8	367	15.2

23. Rate the local and State evaluation reports on the adequacy with which they properly QUALIFY FINDINGS. (notes b and e)

(Qualification of Findings: the extent to which the report properly qualifies the findings and assumptions and identifies those conditions and situations where the findings are not applicable). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Num ber	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	2,416	36	1.5	77	3.2	720	29.8	1,236	51.2	347	14.4
State reports	2,358	14	0.6	169	7.1	740	31.4	1,150	48.7	286	12.1

24. Rate the local and State evaluation reports on the CREDIBILITY OF FINDINGS. (notes b and e)

(Credibility of Findings: the degree of confidence expressed in the findings through statements of statistical certainty, soundness of method, evidence of replication, consensual agreements, similar experiences, supporting expert judgment and opinions, and reasonableness of assumptions). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	2,451	31	1.3	118	4.8	616	25.1	1,282	52.3	404	16.5
State reports	2,398	47	1.9	181	7.5	625	26.1	1,281	53.4	266	11.1

25. Rate the local and State evaluation reports on the adequacy of the QUALIFICATION AND QUANTIFICATION OF MEASUREMENT DATA. (notes b and e)

(Qualification and Quantification of Measurment Data: the extent to which the evaluation of assessments can be qualified and quantified into measurable attributes and parameters that address the problem in measurable, operational, or concrete terms). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	2,446	39	1.6	120	4.9	810	33.1	1,121	45.8	358	14.6
State reports	2,371	62	2.6	145	6.1	778	32.8	1,031	43.5	355	15.0

26. How often do your title III, local program evaluations adequately report information on the need assessment, number of children, per pupil expenditure, project achievement and pupil benefit parameters? (Check one box in each row.) (notes b and e)

	Projected number responding from 8,936	Very often		Generally		As often as not		Occasionally		Seldom	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Information on the manner in which the needs of children are assessed	2,358	692	29.3	1,015	43.0	125	5.3	299	12.7	227	9.6
(2) Information on the number of children in the program	2,365	1,045	44.2	857	36.2	131	5.5	111	4.7	221	9.3
(3) Per pupil expenditures of each program	2,328	640	27.5	936	40.2	212	9.1	265	11.4	276	11.9
(4) Evidence of qualifiable and measurable achievement	2,329	562	24.2	1,070	45.9	202	8.7	229	9.8	266	11.4
(5) Evidence of qualifiable or measurable pupil benefits	2,347	642	27.3	967	41.2	242	10.3	264	11.2	232	9.9

27. From your experience, how often can you draw comparisons between the results of your local Federal program and Federal programs in other localities from State and Federal evaluation reports? (Check one box for each type of report.)

	Projected number responding from 8,936	Very often		Generally		As often as not		Occasionally		Seldom		No basis to judge	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
State reports	2,428	112	4.6	523	21.5	110	4.5	518	21.3	424	17.5	742	30.6
Federal reports	2,433	72	3.0	309	12.7	209	8.6	331	13.6	567	23.3	945	38.9

Section D: Complete this section only if you have a funded title VII program.

28. The demonstration of program results should be an important factor in the continuance of program funding from the Office of Education. Consider each of the following types of findings used to assess programs. FROM YOUR EXPERIENCE, which types of results do you think are more likely to impress OE or State education agency program officers. Indicate your answer by rank ordering each of the following alternatives from the most to least impressive. Select the type of results which you think is most likely to impress OE or State education agency officials. Rank this 1st. Do the same for all the remaining categories, ranking them 2nd, 3rd, 4th, 5th, 6th, and 7th. (notes b and e)

	Projected number re-spond ing from 8,936	1st		2nd		3rd		4th		5th		6th		7th	
		Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent	Num-ber	Per-cent
(1) Improvement in educational management or accountability	453	97	21.4	62	13.6	44	9.6	56	12.4	68	15.0	102	22.5	25	5.4
(2) Improvement in school services or facilities	453	36	8.0	38	8.4	33	7.2	75	16.6	65	14.3	117	25.7	90	19.9
(3) Student improvement through gain scores on grades or teacher ratings	450	54	12.0	5	1.1	33	7.3	61	13.6	62	13.7	73	16.1	163	36.2
(4) Student improvement through gain scores on standardized norm-referenced tests	454	203	44.8	151	33.2	44	9.7	16	3.4	6	1.2	6	1.3	29	6.4
(5) Student improvement through gain scores on criterion-referenced tests	444	19	4.2	101	22.7	63	14.1	94	21.1	74	16.6	73	16.5	22	5.0
(6) Student improvement through gains in the affective domain (i.e., likes, dislikes, interests, attitudes, motives, etc.)	444	37	8.3	25	5.5	66	14.8	96	21.6	106	23.9	29	6.5	86	19.4
(7) Improvements in curriculum and instructional methods	454	23	5.1	71	15.5	160	35.2	50	11.0	85	18.7	38	8.4	28	6.1

29. Regardless of the types of results which are likely to impress OE or State education agency program officials, what types of results are likely to impress you, an educator? Indicate your answer by rank ordering each of the following alternatives with the same procedure used in the previous question. (notes b and e)

	Projected number responding from 8,936	1st		2nd		3rd		4th		5th		6th		7th	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Improvement in educational management or accountability	441	19	4.3	67	15.1	67	15.1	95	21.5	53	12.0	54	12.1	88	19.9
(2) Improvement in school services or facilities	441	20	4.5	7	1.6	93	21.0	49	11.0	107	24.3	70	15.8	96	21.8
(3) Student improvement through gain scores on grades or teacher ratings	441	89	20.1	36	8.1	29	6.6	36	8.2	79	17.8	69	15.7	104	23.6
(4) Student improvement through gain scores on standardized norm-referenced tests	441	131	29.6	39	8.9	69	15.7	58	13.1	66	15.0	51	11.6	28	6.2
(5) Student improvement through gain scores on criterion-referenced tests	441	61	13.8	87	19.6	49	11.1	48	10.8	37	8.3	95	21.6	65	14.8
(6) Student improvement through gains in the affective domain (i.e., likes, dislikes, interests, attitudes, motives, etc.)	441	107	24.3	121	27.4	38	8.5	25	5.6	34	7.6	32	7.2	86	19.5
(7) Improvement in curriculum and instructional methods	441	73	16.5	76	17.1	101	22.9	84	19.1	84	19.1	19	4.3	5	1.0

	Number of projected responses from 8,936 (note b)	Responses	
		Number (note b)	Percent (note c)
30 Are your local evaluations of federally funded programs usually performed by external or internal evaluators? (Check one.)	426		
___Internal (e.g., local education agency staff)		205	48.1
___External (e.g., consultants)		91	21.3
___Both		131	30.7
			100.0 f/
31. Which of the following types of tests did your local education agency administer for its title VII evaluation? If your local education agency did not test title VII students, skip questions 31 and 32.	394		
___Standardized norm-referenced tests (note d)		357	90.7
___Criterion-referenced tests (note g)		148	37.5
___Other tests (please specify)		91	23.0
32. How did you report the results for the standardized norm-referenced testing?	396		
___Raw scores		132	33.4
___Grade equivalents		288	72.7
___Percentiles		204	51.6
___Quartiles		48	12.0
___Stanines		35	8.8
___Other (please specify)		28	7.1

__NOTE__: In the following five questions you will be asked to rate several aspects of the Elementary and Secondary Education Act, title VII, local and State evaluation reports that affect the degree to which these documents satisfy your policy, management, and programmatic information needs. You are asked to provide overall judgments on the adequacy of the quality, informational content, and utility of the evaluation reports. Do this by considering each of these attributes: very deficient, deficient, marginal, adequate, and more than adequate. Check the box which most appropriately reflects how you feel about the respective local and State evaluations with regard to the particular aspects in question.

33. Rate the FOCUS AND SCOPE of the local and State evaluation reports. (notes b and e)

(__Focus and Scope__: the adequacy with which the report covers the the essential and related material and the appropriateness of the emphasis and treatment given to the relevant topics, details, and high and lower priority information). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local report	363	0	0	11	3.0	146	40.1	175	48.1	32	8.7
State reports	314	24	7.7	23	7.2	143	45.6	120	38.3	4	1.3

34. Rate the local and State evaluation reports on the PRESENTATION OF REQUIRED MANAGEMENT INFORMATION NEEDS. (notes b and e)

(__Presentation of Required Management Information Needs__: The extent to which the report presents the information needed to evaluate and update policies by those who transfer policy decisions into plans, budgets, program implementation, curriculum, operational oversight, resource allocations, forecasts, status assessments and reports, educational accountability, costs, benefits, and efficiency assessments). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	363	0	0	17	4.7	135	37.1	163	45.0	48	13.2
State reports	314	18	5.7	28	8.8	139	44.2	121	38.4	9	2.9

35. Rate the local and State evaluation reports on the adequacy with which they properly QUALIFY FINDINGS. (notes b and e)

(Qualification of Findings: the extent to which the report properly qualifies the findings and assumptions and identifies those conditions and situations where the findings are not applicable). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	363	0	0	17	4.6	127	34.9	183	50.5	37	10.1
State reports	314	23	7.3	29	9.3	165	52.6	95	30.1	2	0.6

36. Rate local and State evaluation reports on the CREDIBILITY OF FINDINGS. (notes b and e)

(Credibility of Findings: the degree of confidence expressed in the findings through statements of statistical certainty, soundness of method, evidence of replication, consensual agreements, similar experiences, supporting expert judgment and opinions, and reasonableness of assumptions). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	362	1	0.3	28	7.7	143	39.4	138	38.2	52	14.4
State reports	314	24	7.7	25	7.8	142	45.1	122	38.8	2	0.6

37. Rate the local and State evaluation reports on the adequacy of the QUALIFICATION AND QUANTIFICATION OF MEASUREMENT DATA. (note b and e)

(Qualification and Quantification of Measurement Data: the extent to which the evaluation assessments can be qualified and quantified into measurable attributes and parameters that address the problem in measurable, operational, or concrete terms). (Check one box in each row.)

	Projected number responding from 8,936	Very deficient		Deficient		Marginal		Adequate		More than adequate	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Local reports	349	2	0.4	3	0.9	138	39.6	165	47.3	41	11.8
State reports	295	25	8.3	21	7.1	106	35.9	127	43.1	17	5.6

38. How often do your Elementary and Secondary Education Act, title VII, local program evluations adequately report information on the need assessment, number of children, per pupil expenditure, project achievement, and pupil benefit parameters? (Check one box in each row.) (notes b and e)

	Projected number responding from 8,936	Very often		Generally		As often as not		Occasionally		Seldom	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
(1) Information on the manner in which the needs of children are assessed	369	146	39.4	161	43.6	4	1.1	45	12.1	14	3.8
(2) Information on the number of children in the program	368	198	53.7	106	28.8	2	0.5	50	13.5	13	3.5
(3) Per pupil expenditures of each program	367	89	24.3	103	27.9	69	18.8	79	21.4	28	7.6
(4) Evidence of qualifiable and measurable achievements	369	135	36.6	152	41.2	28	7.6	40	10.8	14	3.8
(5) Evidence of qualifiable or measurable pupil benefits	368	148	40.1	123	33.4	28	7.6	54	14.5	16	4.3

39. From your experience, how often can you draw comparisons between the results of your local Federal program and Federal programs in other localities from State and Federal evaluation reports? (Check one box for each type of report.) (notes b and e)

	Projected number responding from 8,936	Very often		Generally		As often as not		Occasionally		Seldom		No basis to judge	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
State reports	361	40	11.1	72	19.9	12	3.3	104	28.8	37	10.2	97	26.9
Federal reports	374	22	5.9	39	10.4	34	9.1	95	25.4	88	23.5	97	25.9

a/We requested that the questionnaire be completed by local education agency officials familiar with the local agency's evaluation efforts conducted for Elementary and Secondary Education Act, titles I (regular, migrant, neglected and delinquent, etc.), III, and VII, and the local agency's own assessment efforts. The questionnaire was divided into four sections: section A, National Assessment of Educational Progress and local education agency testing programs; section B, Elementary and Secondary Education Act, title I; section C, title III; and section D, title VII evaluation efforts. We suggested that the questionnaire be taken apart and distributed to persons most familiar with each part, such as the local education agency director of research, planning, and evaluation for section A, the respective local education agency directors of title I for section B, title III for section C and title VII for section D. Some of the questions from the questionnaire have been omitted from this report. Questions pertaining to the National Assessment of Educational Progress and local education agency's own testing programs are shown in GAO's report to the Congress (HRD-76-113), dated July 20, 1976.

b/In April 1975 we sent the questionnaire to a national statistical sample of 832 local school districts. By June 1975 we received responses from 710 school districts or 85 percent. The numbers shown above represent the number of local school districts in the Nation--out of the 11,666 in the defined universe with 300 or more pupils--to which our local questionnaire sample responses have been projected. We projected a total of 8,936 local education agencies responding instead of 11,666 for technical reasons--based on the weighting and the response rates across the various strata in our sample, this method allows us to obtain the most accurate percentage breakdowns on the answers given. Where the number of responses to each line item do not total to the "Number of projected responses" column, it is due to rounding.

c/This column shows for each question the percentage of projected respondents choosing each specific answer.

d/Standardized norm-referenced tests are tests which purport to assess the individual student's ability or achievement in broad subject areas as compared to the rest of the test population (e.g., the Metropolitan Achievement Test (MAT) or the Wechsler Intelligence Scale for Children (WISC)).

e/The percent columns show the percentage of projected respondents to each line item choosing each category. Where the percentages on each line do not add to 100.0, it is due to rounding.

f/Total does not add to 100.0 due to rounding.

g/Criterion-referenced tests are tests specifically constructed to measure students' attainment of specific educational objectives or proficiency with specified curriculum material. These tests, which may be standardized, usually provide a specific and operational description of the level and type of task performance or behavioral measures used as a criterion to indicate attainment of the educational objectives. For example, the student must be able to compute the correct product of all single digit numerals greater than zero with no more than five errors.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON D.C. [illegible]

JUN 15 1977

Mr. Gregory J. Ahart
Director
Human Resources Division
United States General
  Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report entitled, "Problems and Needed Improvements In Evaluating Office of Education Programs." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

Thomas D. Morris
Inspector General

Enclosure

Comments of the Department of Health, Education, and Welfare on the Comptroller General's Report to the Congress entitled "Problems and Needed Improvements in Evaluating Office of Education Programs," February 22, 1977, B-164031 (1)

General Department Comments

The subject GAO report critically assesses the Office of Education's program evaluation mechanisms, concludes that opportunities exist for improvement, and recommends that the Secretary of HEW direct the Commissioner of Education and the Director of the National Institute of Education to take a number of corrective actions. Several changes would strengthen the report. There needs to be more careful consideration of the costs of evaluation. While there is an assertion (p. 50) that "the amount of funds spent to evaluate State and/or local education agency Title I, III, and VII elementary and secondary education programs is substantial," on p. 33 the amounts are respectively 0.2% of Title I and 1.8% of Title III. Twenty cents per $100 is not "substantial."

While the quality of data the report appears to expect would require significant additional resources and this expenditure is not possible within existing budgets, it would also be high in relation to the possible payoffs through improvements in the programs. Are the increased costs of providing better information to State and local decision-makers likely to result in sufficient improvements to justify the expenditure? Do State and local decision-makers have the incentives and does the state-of-knowledge permit improvements or economies at the local level equal (at least) to the increased costs of evaluation improvements? If the costs of improved evaluation are not recoverable in improved productivity or efficiency, calling for more is a questionable recommendation. As another example, the call for the NIE to support more research on criterion-referenced testing is acceptable, but this is, as recognized in the report, a long-term effort, and it is not clear whether GAO believes NIE deserves additional appropriations for such an effort. NIE can hardly divert substantial resources from its present $70 million.

A final point deserves mention. In spite of the reports of three of the four key congressional committee staff members that OE's evaluations "often have been completely ineffective or have had little impact on legislation" (p. 21), there is a growing body of professional opinion that OE's studies have, over the past ten years, been responsible for many major changes in existing legislation. In retrospect, even though, apparently many of the reports did not reach "Congressional decision-makers" in a timely manner, the reports were solid pieces of work, widely discussed and debated, and by the time the next piece of legislation came up, the climate of opinion about particular programs had changed.

As a result of such retrospective analysis, the approach to evaluation which assumes there are certain "decision-makers" and that effective evaluations provide timely data to them is increasingly being questioned. Rather it appears that effective evaluations affect the broad political climate within which particular decisions are made. The large scale OE evaluations have stood the test of time in this view of evaluation far better than any of the alternatives proposed in the report appear likely to. (To underscore this point witness the large number of citations of these large-scale OE studies in the report itself.)

In short, the report is well done within its limits. The recommendations do not give adquate recognition to the additional financial burden they entail, nor to whether the tradeoffs in improved program quality are likely to justify the additional expenditures. And there is no discussion of the limitations of the view that evaluation ought to serve decision-making in a direct and linear sense.

GAO Recommendation

That the Secretary of HEW direct the Commissioner of Education to more strongly emphasize the purpose of providing information to the Congress when planning, implementing, and reporting on evaluation studies. In particular, more attention should be given to timing the studies so that they closely coincide with the legislative cycle. (See GAO note p. 124) and briefing congressional committee staff more frequently.

Department Comments

We concur with the general conclusion that Congressional needs can be better served than we are now doing. First, we concur that it is clearly desirable that evaluation studies should be timed to more closely coincide with the legislative cycle. It is not the case, however, as GAO has apparently concluded, that this obviously important problem has not received attention. Rather, the frequent failure to coincide studies with the legislative cycle has been due to such factors as: inadequate funds to initiate evaluations at the right time; delays in the procurement cycle due to uncertainties in the appropriation process; increased difficulty in getting studies and data collection instruments cleared; and failure to anticipate difficulties and delays in the data collection process in the field. Nevertheless, we believe these problems can be more effectively addressed and, in order to do so, we have initiated a series of reviews of our studies which focus on predicted production dates for findings and recommendations vis-a-vis critical dates for input to legislation renewal.

Second, we concur that congressional committee staff should be briefed more directly and fully on the findings of evaluation studies. This need has not received the attention it deserves, but we have recently made the decision to institute such briefings on all major evaluation studies, and expect to get this new procedure underway in the coming weeks.

(See GAO note p. 124)

GAO Recommendation

That the Secretary of HEW direct the Commissioner of Education to better define the program objectives to be evaluated as required by the General Education Provisions Act. This includes translating the legislative purposes of each program into specific qualitative and measurable program objectives, and clearly stating these objectives, and the progress made toward achieving them, in the annual evaluation report.

Department Comments

We do not concur. In most cases, legislation fails to state a program's objectives with sufficient clarity that they are readily susceptible to evaluation. But very often this failure of the legislation to be clear and precise on program objectives is the price paid through political compromise for getting the legislation passed at all. The Office of Education proceeds at considerable peril in trying to further specify legislation. It has in fact been criticized on several occasions for going further than the Congress intended, and of "trying to legislate by means of regulation." Furthermore, in many cases it has been the Congress' specific intention to avoid specification of program objectives and to leave such judgments and decisions up to State and local officials.

For example, in turning down a proposed amendment to concentrate seventy-five percent of compensatory funds on basic skills Title I of ESEA, the Senate Committee said:

> "The Committee believed it inappropriate for the Federal government to sustain its judgments on appropriate Compensatory Education Programs for that of State and local officials." (Senate Report 93-763, 1974, p. 30)

On the same question the House observed:

> "The Committee feels strongly that the Local School Agency is the appropriate level to determine the special needs of educationally deprived children and should be primarily responsible for determining approaches to meeting those needs." (H Report 93-805, 1974, p. 20-21)

For all these reasons, we believe there are very definite limits on the Office of Education's authority and ability to increase the clarity and specificity of program objectives.

GAO Recommendation

That the Secretary of HEW direct the Commissioner of Education to improve the implementation of evaluation results by giving greater attention and priority to procedures such as the issuance of Policy Implication Memorandums designed to insure implementation of those results.

Department Comments

We concur. The need to improve the utilization and implementation of evaluation reports is a major problem which all Federal agencies and the Congress jointly face, and we further concur that increased efforts should be devoted to its solution. The Policy Implications Memorandum (PIM) is an invention of OE's evaluation office, and while its potential for improving the utilization of evaluation findings is considerable, GAO is correct in observing that it has not been used nearly as extensively in OE as it should have been. Efforts are currently underway to expand the production and use of the PIM. We are now conducting periodic reviews of the production schedule for PIMs and emphasizing their high priority.

GAO Recommendation

That the Secretary of HEW direct the Commissioner of Education to assess whether State and/or local evaluation reports for Title I and VII of the Elementary and Secondary Education Act can be improved so that they supply officials at Federal, State, and/or local levels with the reliable program information they need for decision making.

GAO Recommendation

That the Secretary of HEW direct the Commissioner of Education to review the types of State and/or local program information collected on programs authorized by Titles I, III, and VII of the Elementary and Secondary Education Act.

Department Comments

We concur with the general thrust of GAO's recommendations in this area, but most of the actions that GAO recommends are already underway, many by legislative mandate.

With respect to Title I, new evaluation requirements (Section 151 created by P.L. 93-380) directed the Commissioner to develop evaluation models and standards and to provide technical assistance to the States and local districts in order to improve the quality of local Title I evaluations and to yield comparable data which could be aggregated to State and National levels. All of this is being carried out: OE has interviewed personnel in policy making roles at the Federal level (both Congressional and HEW staff) to determine the kinds of information they felt should be included in the annual State and local evaluation reports; an advisory group of personnel from the different operating levels of the Title I program (including parent representatives) indicated the kinds of information they thought should be included in the reports; and evaluation models and their associated reporting forms were developed and reviewed by each State agency and three of its locals to determine the kinds of problems they might have in using them. As a result of these efforts, a limited core of essential information was identified as being desirable at the Federal level. This core of information is substantially less than what has frequently been contained in State and local reports in the past. It will become the Federal evaluation requirement when regulations for this portion of the legislation are published.

OE has sponsored a series of workshops for State and local evaluation staff in the use of the standard evaluation models and reporting system. We have established ten technical assistance centers--one for each of the HEW regions--to provide technical assistance and training for State and local staff on a continuing basis. We have prepared training manuals and guidebooks for widespread dissemination to current and future users of the models and reporting system. Once the models and system are in place across the nation, their use should result in data which can be aggregated across States and across school districts. And, once they are in place, OE will be better able to assess whether or not the resultant data are sufficiently free of systematic errors to support aggregations to the State and national levels in a satisfactory manner. If they are not, then a determination can be made as to whether technical problems existed that could be overcome or whether different kinds of studies needed to be done to satisfy Federal, State, and local reporting requirements.

With respect to the recommendation on ESEA Title VII local evaluation reports, we believe they can be improved and we have taken the following steps to do so. Recently published Title VII regulations strengthen the requirements for evaluation of LEA bilingual projects. In addition, NIE and OE have a joint project underway to upgrade the technical expertise of persons responsible for local evaluations. While we believe it is worthwhile to improve local evaluations, the extent to which such evaluations will be useful at the Federal level is not yet evident. Certainly the problems of aggregating across local bilingual evaluations are more severe than in Title I, if only because of the multiplicity of languages involved.

(See GAO note p. 124)

Thus, as regards the much needed and legislatively mandated actions to improve State and local evaluations and reporting under Titles I, IV, and VII, we believe GAO's understanding is incomplete **(See GAO note p. 124)** that the problems they refer to are well understood by both the Office of Education and Congress and that appropriate actions to deal with them are already well underway, and in some cases near completion.

GAO Recommendation

That the Secretary direct the Director, National Institute of Education, to consider the need for funding additional research on (1) criterion-referenced tests and other alternatives to standardized norm-referenced achievement tests for uses which include program evaluation and (2) the nature and extent of racial, sexual, and cultural biases in standardized tests and how such biases may be reduced.

Department Comment

We concur. Several groups within the Institute presently have ongoing research programs in criterion-referenced testing and test bias. More emphasis will be given to these programs in FY 1977, FY 1978, and FY 1979 if appropriations for the Institute are increased significantly above present levels.

Under NIE leadership, the Center for the Study of Reading at the University of Illinois and the Center for the Study of Evaluation at UCLA are doing research that will lead to alternatives to standardized achievement tests in reading comprehension and writing. In addition, statistical research is in progress on how to assess the probability of making errors in classifying students on such tests, how to set the length of such tests and how to determine passing scores.

The SOBER-Espanol project funded by NIE is developing criterion-referenced tests to assess competency in reading Spanish for grades K-6. The SOBER system allows teachers to create "tailor-made tests" by matching prepared test items to reading objectives. Currently, K-3 tests are being published and distributed through Science Research Associates. Grades 4-6 will be published later this year.

NIE is also supporting research and development on criterion-referenced testing and other alternatives to norm-referenced achievement tests for the purpose of educational exit testing and occupation entry selection.

In December 1975 NIE held a conference for test developers, test critics and others to consider methods of identifying and eliminating bias in reading achievement tests. Since that time, NIE has funded two grants on test bias: one is a project to detect and eliminate the motivational causes of test bias and the other is a project to debias the language found in a widely used, standardized achievement test. And finally, NIE has an in-house project which applies new methods of qualitative data analysis to the intractable problem of detecting bias in test items.

NIE is also supporting work on sex bias in the assessment of a person's occupational interests and biases in educational exit and occupational entry testing--the latter being of particular importance given the *Griggs v. Duke Power* decision of the U.S. Supreme Court. The products of these studies include the NIE Guidelines on Sex-Fair Vocational-Interest Measurement and the Abt kit on the interpretation and usage of sex-fair vocational-interest tests.

GAO Recommendation

That the Secretary direct the Director, National Institute of Education, to improve dissemination of available NIE-funded information, which is intended to help in selecting the most appropriate standardized tests, thereby increasing State and local education agency officials' awareness and use of this information.

Department Comment

We agree that there is a need to improve the dissemination of NIE-funded material intended to help educators select appropriate standardized tests. The Institute's policy is not to force its products on school personnel, but we do intend to make school personnel familiar with the products that are available. In the case of our consumer's guides to standardized tests, that is, the test evaluation books produced for NIE by the Center for the Study of Evaluation at UCLA and mentioned in this GAO report, our Basic Skills Group and our Dissemination and Resources Group are collaborating in the dissemination of these products. Several approaches are or will be used. First, the test evaluation books are listed in the Institute's Catalog of NIE Education Products. This catalog has been offered free to each superintendent of schools and each district director of curriculum in the country. Five thousand copies have been distributed to superintendents. A similar distribution will now be made to the district directors of evaluation, who presumably will be particularly interested in the test evaluation books. In addition, we plan to use the newly formed Lab and Center R&D Exchange to give school personnel more information about the acquisition and use of test evaluation books (e.g., through brochures or workshops). This dissemination network has the potential of reaching 50 percent of the country's school systems. Still another dissemination network that will be used in a similar way is the one formed by our seven R&D utilization contractors (five State education agencies and two nongovernmental organizations). If the GAO report is correct in identifying a need for the test evaluation books--and we think that it is--these approaches should give the books much wider dissemination than they have had up to this point.

NIE is also sponsoring the dissemination of test information in more specialized areas. The Education and Work Group has supported consumer guides to standardized tests in career education and occupational preparation. Dissemination of products will also be built into the further work of this group to improve testing in career education. The Educational Equity Group has funded American Institutes for Research to develop a catalog reviewing assessment instruments for children of limited English-speaking ability at the K-6 levels. Descriptive information (author, publisher, research data available, etc.) and analyses of the appropriateness of the tests for use with bilingual children will be provided. All information will be comprehensible to educational practitioners. This contract will also identify those areas and levels for which existing tests are inadequate or nonexistent.

(See GAO note below)

GAO note: Deleted comments pertain to material presented in the draft report which has been revised or not included in the final report.

ADDITIONAL SUGGESTIONS BY OE CONFEREES
FOR IMPROVING TESTING AND EVALUATION

As discussed in chapter 6, the Office of Education sponsored a special 4-day conference on "Achievement Testing of Disadvantaged and Minority Students for Educational Program Evaluation" in May 1976. The Office invited about 50 experts in testing, program evaluation, and related fields, including university and other researchers, and representatives of leading test publishers. Federal and local education agencies, as well as education and other interest groups, were also represented. The conference focus was on large-scale program evaluations of elementary and secondary school compensatory and desegregation programs--programs on which OE concentrates much of its effort. The purpose of the conference was to identify, define, and analyze the many problems associated with using standardized achievement tests in these programs, and was to develop interim and long-term solutions.

In addition to the suggestions discussed in chapter 6, conclusions and recommendations from the five small working groups formed at the conference's close included the following:

--In the context of educational program evaluation: development, standards, administration, and use of standardized tests must be accounted for and monitored. Alternative approaches which should be explored include: (1) Federal legislation to establish a monitoring body with enforcement powers to oversee the testing practices of test developers, State and school district educational systems, researchers, and others, (2) an independent monitoring agency sponsored by major test developers composed of minority and organizational representatives, and (3) an enforceable testing code of ethics, including mandatory withdrawal of services by test producers in established cases of misuse of tests and test information.

--There is need for federally funded studies to increase understanding of the nature and extent of biases in tests and how such biases might be reduced. Studies of this problem might include detailed studies of individual pupils in interviews or computer simulations of bias models.

--There is no clear consensus on test bias definitions nor clear technical procedures for identifying a biased question or test. There is, nevertheless, enough documentation of public concern--including calls for cessation of testing--and empirical data to justify change and development of guidelines. It is imperative that the testing community join with other interested groups to agree on the steps to be taken to develop and use tests that are judged to be fair.

--Specific guidelines are also needed for test administration and assessment of bilingual groups.

--There clearly needs to be an extension of the present professional testing standards of the American Psychological Association to cover the use of achievement tests in program evaluation.

--OE should support developing a procedures manual for determining the appropriateness of using achievement tests in program evaluation and properly selecting, administering, scoring, and interpreting data from such tests. Such a manual should include the degree that other information must be used together with achievement tests to adequately describe program outcomes. This should be the first (and more immediately accomplishable) stage of a longer term effort to produce procedures manuals that address means other than achievement tests for collecting program evaluation data. For the longer term effort, more experimentation (field-testing) is needed to investigate alternative data collection modes to firmly establish them.

--Publishers of standardized tests should give explicit step-by-step instructions in their users' or technical manual about how to use their tests correctly for various purposes and how to avoid misuse. For example, these purposes may include needs assessment, diagnosis and prescription, or project evaluation.

--The use of grade-equivalent scores on standardized tests should be eliminated.

--More tests ought to be developed for diagnosing educational problems and prescribing remedies.

--The work statements for evaluations in Federal agency requests for proposals are not always adequate. Examples can be cited in which technical approaches have been overspecified by persons who perhaps have not fully understood either the technical or the practical problems involved. More time needs to be allocated for writing requests for proposals, and more professional review of them must be accomplished. Detailed technical and procedural specifications should never be included in work statements unless such specifications are the consensus of a panel of national experts in the field.

PRINCIPAL OFFICIALS OF THE DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE RESPONSIBLE FOR ACTIVITIES DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
SECRETARY OF HEALTH, EDUCATION, AND WELFARE:		
Joseph Califano	Jan. 1977	Present
David Mathews	Aug. 1975	Jan. 1977
Caspar W. Weinberger	Feb. 1973	Aug. 1975
Frank C. Carlucci (acting)	Jan. 1973	Feb. 1973
Elliot L. Richardson	June 1970	Jan. 1973
ASSISTANT SECRETARY FOR EDUCATION:		
Mary Berry	Apr. 1977	Present
Philip Austin (acting)	Jan. 1977	Apr. 1977
Virginia Y. Trotter	June 1974	Jan. 1977
Charles B. Saunders, Jr. (acting)	Nov. 1973	June 1974
Sidney P. Marland, Jr.	Nov. 1972	Nov. 1973
COMMISSIONER OF EDUCATION:		
Ernest L. Boyer	Apr. 1977	Present
William F. Pierce (acting)	Jan. 1977	Apr. 1977
Edward Aguirre	Oct. 1976	Jan. 1977
William F. Pierce (acting)	Aug. 1976	Oct. 1976
Terrel H. Bell	June 1974	Aug. 1976
John R. Ottina	Aug. 1973	June 1974
John R. Ottina (acting)	Nov. 1972	Aug. 1973
Sidney P. Marland, Jr.	Dec. 1970	Nov. 1972
Terrel H. Bell (acting)	June 1970	Dec. 1970
James E. Allen, Jr.	May 1969	June 1970
DIRECTOR, NATIONAL INSTITUTE OF EDUCATION:		
John Christensen (acting)	July 1977	Present
Emerson J. Elliott (acting)	Jan. 1977	July 1977
Harold L. Hodgkinson	July 1975	Jan. 1977
Emerson J. Elliott (acting)	Oct. 1974	July 1975
Thomas Glennan	Oct. 1972	Oct. 1974

(104003)

PART 10: ADMINISTRATIVE STRUCTURE OF THE EDUCATION DIVISION AND GENERAL EDUCATION PROVISIONS ACT

WEDNESDAY, AUGUST 3, 1977

House of Representatives,
Subcommittee on Elementary, Secondary and
Vocational Education,
Committee on Education and Labor,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:17 a.m., in room 2175, Rayburn House Office Building, Hon. Carl D. Perkins presiding.

Members present: Representatives Perkins, Ford, Blouin, Mottl, Kildee, Quie, Buchanan, and Pressler.

Staff present: John F. Jennings, majority counsel; Christopher Cross, minority senior education consultant; and Nancy L. Kober, staff assistant.

Chairman **Perkins**. I am delighted to welcome you here this morning, gentlemen.

The purpose of today's hearing is to talk about the administrative structure which has been established for the implementation of Federal elementary and secondary education programs in the Department of Health, Education, and Welfare. We will also discuss any problems which may have been created by various congressional enactments which effect administrative practices within HEW.

The subcommittee has held 27 days of hearings this year on all of these expiring Federal elementary and secondary education programs, and we have about the same number of days ahead in the fall on the title I program and Federal equalization efforts.

But, at this point in time I would like to pause and try to formulate the basic concern which we have in all of these hearings. That concern is that during this year of review of this $5 billion worth of expiring Federal programs we try to reach agreement on what the priorities in Federal aid ought to be and then we assure that our laws and our administration of those laws fit those priorities.

In 1965 it was relatively clear that the number one Federal priority was to try to educate the disadvantaged. Today, with 130 different education programs in the Education Division and with all sorts of educational innovations and trends having occurred since 1965, I am fearful that our priorities are not as clear as they were. Our primary task this year and next year must be to reach agreement again between the Congress and the Administration on our priorities so that they are crystal clear.

But then, once we have agreed on our priorities, we must ask three other questions.

First, do programs fit together so that they fulfill these priorities?

Second, are the personnel in the Education Division being assigned in such a fashion as to fulfill our priorities?

And, lastly, are the administrative burdens, including the paperwork burdens, we place upon State and local officials serving to show these priorities?

From our 27 days of hearings, I would like to point out three examples of how I do not believe that we can answer those three questions affirmatively today.

The first example has to do with bilingual education.

A local school district can now apply for a grant under the Bilingual Education Act to the U.S. Office of Education in Washington and receive this grant while at the same time it can apply for a grant to the Dallas regional office of U.S.O.E. under the Emergency School Aid Act and also receive a grant, without the Office of Education personnel in either division knowing that the school district has applied for and received money for the same purpose.

Furthermore, since both of these programs are administered directly by the Federal Government and do not go through State departments of education, the same school district can also receive a grant under Texas' bilingual education program without the State of Texas knowing that it has received Federal money under either of the two other programs.

I believe that this is an instance where our Federal programs do not fit well together to fulfill one of the purposes of Federal aid.

An example of how the administrative structure of the Education Division does not fit the priorities we had established is shown by looking at the number of people assigned to administer various programs.

Last year 72 people were assigned in the Office of Education to administer the $2.3 billion title I program while 26 people were assigned to administer the $26 million National Reading Improvement Act.

Other examples can be cited showing what seems to be a lack of correlation in relevant importance of programs and the number of personnel assigned to administer them.

As regards the burdens placed upon State and local administrators, data submitted by the National Center for Education Statistics show that the Community Education Act which is a program receiving less than one-tenth of one percent of the elementary and secondary education appropriation in the Office of Education is causing 4.9 percent of the paperwork burden at the State and local levels. Other examples can also be cited showing again what seems to be a disproportion between what we say are Federal priorities and their impact on the State and local levels.

The reason that I have taken so long to bring out these issues is that we are half-way through our hearings now and through reviewing these programs. And I believe that now is the time for us to step back and to ask ourselves these basic questions.

That is why I am so pleased today that Commissioner of Education Ernest Boyer has agreed to testify, and since I have sent him a copy of this opening statement ahead of time and also related data I hope that he will respond to these questions.

I look forward to his testimony with a great deal of interest.

I am delighted this morning to welcome as our first witness Hon. Ernest L. Boyer, Commissioner, U.S. Office of Education, accompanied by Dr. Peter D. Relic, Deputy Assistant Secretary for Education, Education Division, Department of Health, Education and Welfare.

Dr. Boyer is also accompanied by Dr. Albert L. Alford, who has been with us a long time here as Assistant Commissioner for Legislation, and Dr. Blakey, Deputy Assistant Secretary for Legislation.

PANEL OF HON. ERNEST L. BOYER, U.S. COMMISSIONER OF EDUCATION, U.S. OFFICE OF EDUCATION, HEW; PETER D. RELIC, DEPUTY ASSISTANT SECRETARY FOR EDUCATION, HEW; ALBERT L. ALFORD, ASSISTANT COMMISSIONER FOR LEGISLATION, OFFICE OF EDUCATION AND WILLIAM A. BLAKEY, DEPUTY ASSISTANT SECRETARY FOR LEGISLATION, HEW

STATEMENT OF HON. ERNEST L. BOYER

[The prepared statement of Ernest Boyer follows:]

Statement by
Honorable Ernest L. Boyer
U.S. Commissioner of Education
U.S. Office of Education
Department of Health, Education, and Welfare
Before the
Subcommittee on Elementary, Secondary, and Vocational Education
Committee on Education and Labor
U.S. House of Representatives
Washington, D.C.
Wednesday, August 3, 1977
9:00 a.m.

Dr. Boyer is accompanied by:

Albert L. Alford, Assistant Commissioner for Legislation, U.S. Office of Education, HEW

William A. Blakey, Deputy Assistant Secretary for Legislation (Education), HEW

Mr. Chairman and Members of the Subcommittee:

I am pleased to be here this morning to comment on the issues you have raised in your opening statement and to add a few observations of my own regarding the administration of the General Education Provisions Act and how legislative mandates affect the administration of these programs.

First, let me respond to the questions raised in your opening statement.

Educational Priorities

First, I agree that it is time to look closely at our priorities in education and to ask just what the Federal government should and should not do. After all education in the Nation has always been and must continue to be primarily a State and local responsibility and the Federal government should fund the enterprise only when selected National purposes are to be achieved.

But even so Federal participation is absolutely essential and what we do can make a crucial difference. Several months ago we reviewed all of the major education legislation and looked at approximately 120 different programs for which we are responsible. Our goal was to reaffirm as best we could, our own priorities and clarify the Federal role in education. Today we have no firm and final blueprint to propose. However, as we looked at what we've been asked to do by Congress it seemed quite clear that the Office of Education has six very specific mandates to fulfill.

1. We are to promote equality of access to our schools and colleges;
2. We are to encourage equality of excellence, especially by helping those schools which serve disadvantaged children;

3. We are to urge equity of financing within the States so that the great unevenness in school support can be reduced.
4. We are to respond to National emergencies as they come along, especially as they relate to the work of our educational institutions.
5. We are report on the status of education in America, the Office of Education's original and most historic role.
6. We are to stimulate new initiatives in education in response to change in the social context.

Recently, during the budgeting activity in the Office of Education--which has been a very healthy exercise for us--we went through each of our 120 separate programs and discovered that the vast majority of them--certainly the big ones such as Title I, the handicapped legislation, and student aid--fall clearly within one or another of our major program goals and by and large, the Federal role in education has been a clearly marked path and we have stayed on a fairly steady course. This is not to say we have no problems.

As a matter of fact, the Office of Education faces major difficulties in carrying out these mandates, not because the programs are confused but because they do not fit the mandates or the authorizations are at times duplicative and overlapping.

The example you mentioned earlier Mr. Chairman, illustrates the latter point. As things now stand one school district can get three or possibly four different Federal grants for bilingual education without coordination. Such confusion occurs because these programs are created without reference to previous legislation or are assigned by law to specific units within the Office of Education.

Recently, I have tried to tackle this problem of program fragmentation and duplication head on. Even though the legislation has led to unnecessary fragmentation and a proliferation of bureaucratic boxes, I believe we can improve program coordination. Specifically, very shortly I intend to form within OE teams of people who should be working together because of common goals. I intend to bring together an interbureau team to work on basic skills, another to work on the continuing education of teachers, and other teams to work on additional priorities as well. We can, in short, functionally reshape OE in several crucial areas and more rationally reassemble the overlapping structure.

But, in the end, more fundamental changes should occur. Specifically, I urge, that as a general principle, all major program initiatives should focus on a single Federal objective and overlapping purposes should be avoided.

Administrative Structure

But clarity of purpose and cohesive program design is not enough. The Office of Education's administrative structure also is important. I believe that good management requires good organization and one of my early actions was to reorganize the Commissioner's office and to cut back sharply on the offices reporting directly to me. I also established two senior Executive Deputies, one for education programs and the other for support services. This, I believe provides a manageable "span of control" and allows the Commissioner needed flexibility to do the job.

This does not mean that I will lose contact with my top program managers. In fact, I continue to meet with them regularly. However, the new arrangement provides a coordination mechanism through the Executive Deputy structure and eliminates the need for my direct involvement in routine or day to day affairs.

I should quickly add that while this reorganization at the Commissioner's level is essential it still is insufficient. Some reshaping of the Bureaus is required if OE is to carry on its work with full efficiency. Already, we have made one such move in the creation of the Bureau of Student Financial Aid announced earlier this year by Secretary Califano. This new bureau illustrates what I believe to be sound principle of organization. First, it represents a grouping of related programs and, second, it is an organization of sufficient size to allow efficiency in the use of support staff. In the jargon of the scientist we have a "critical mass". We are now moving to complete the reorganization within that Bureau.

I would like in the days ahead to look at each Bureau to determine if it is appropriately structured and staffed. I must point out, however, that when it comes to major OE reorganization we frequently are locked in. In Table 1 I've listed the offices and bureaus and key staff positions within OE which are now legislatively mandated. They range all the way from the small staff for the gifted and talented program with no fixed organizational location to the large Bureau of Occupational and Adult Education where there are four supergrade staff positions required.

Table 1

LEGISLATIVELY MANDATED ORGANIZATIONS AND POSITIONS WITHIN THE OFFICE OF EDUCATION

ORGANIZATION	STATUTE	POSITIONS
1. Regional Offices	P.L. 90-247, Sec. 403(c)(2)(B), as amended	
2. Office of Bilingual Education*	P.L. 93-380, Sec. 105(a)(1)	Director
3. Office of Career Education**	P.L. 93-380, Sec. 406(c)(1)	Director
4. Teacher Corps*	P.L. 89-329, Sec. 512 amended by P.L. 90-35, Sec. 3(a)(3)	Director (GS-17) Deputy Director (GS-16)
5. Office of Indian Education	P.L. 92-318, Sec. 441	Deputy Commissioner (GS-18)
6. Bureau of Education for the Handicapped	P.L. 91-230, Title VI	Deputy Commissioner (GS-18) Associate Dep. Comm. (GS-16) Four (4) Positions (GS-16)

* Commissioner may delegate his functions only to the director.

**The Director must report directly to the Commissioner.

ORGANIZATION	STATUTE	POSITIONS
7. Bureau of Occupational and Adult Education	P.L. 92-318, Title X-C, Sec. 1071(a) as amended	Deputy Commissioner (GS-18) Three positions (GS-17) Three skilled workers or subprofessionals. By end of FY 1978, fifty percent more positions than FY 1976.
8. Office of Libraries and Learning Resources	P.L. 93-380, Sec. 519	Director
9. Office of Environmental Education	P.L. 91-516, Sec. 3(a)(1)	Director (GS-17)
10. Office of Consumer's Education	P.L. 93-380, Sec. 811(a)	Director
11. Community College Unit, Bureau of Higher and Continuing Education	P.L. 92-318, X, Sec. 1072(a) as amended	Director (GS-17)
12. Gifted and Talented Staff, Bureau of Education for the Handicapped	P.L. 93-380, Sec. 404(a)	
13. Veterans Program Branch, Bureau of Higher and Continuing Education	P.L. 89-329, Title IV, Sec. 420(g)	

Congress has the authority to legislate organizational structure, and indeed there is strong evidence that in the past some involvement here was essential to stabilize the program. Still, it is obvious that such legislation has led to an uneven treatment of programs and we now have a bureau structure within the Office of Education based upon a variety of principles--ranging from legislated status (Occupational and Adult) to functional groupings (Student Assistance) to specific clientele (Indians) to levels of education (Elementary and Secondary).

Hence the problem: legislatively mandated organizations created at different times, frequently are out of context with organizational rationale. Again, this is illustrated in the case of bilingual education where Congress placed bilingual activities in an Office of Bilingual Education but it also mandated bilingual functions for the Office of Indian Education and the Bureau of Occupational and Adult Education.

Again let's return to a basic principle: as a general rule organizational authority should be placed with the person who is accountable for the program. To legislate such matters frequently builds in rigidity and makes day to day administration and accountability more difficult.

While discussing OE structure I have one other point to make. Currently, as Table 1 reveals, some programs have been attached by law directly to the Office of the Commissioner. While not judging the motives of such moves or the priority of the programs I must observe that this procedure adds still more confusion to the administrative process. It not only eliminates administrative flexibility and fragments related programs, it also confuses the functions which should and should not be carried on at various levels within an organization. The Commissioner should be responsible for the total organization rather than serve as a manager for selected programs.

This leads me to propose a third general principle: As a general rule programs should be assigned within the organization to the appropriate level of responsibility and the appropriate program category.

Assignment of Personnel

Now a word about the assignment of personnel to OE programs. Let me say at the outset that I am making a complete analysis of OE's staffing pattern to make sure that our personnel assignments match the workload in the office. It is absolutely unacceptable to have some programs overstaffed while other people are chronically overworked and I agree that to have 1/3 as many people administering a $20 million program as we have assigned to a $2 billion program is, on the surface at least, difficult to explain. Without defending this particular situation I do wish to make two relevant observations. First it's not the size of a program alone which determines staff. For example, a program where funds are "sent on" to State agencies, may require less staff than one administered entirely by OE. The fact is that from an administrative standpoint, it may be as difficult to manage a small program as it is a larger and more comprehensive one. Regulations must be prepared and approved, applications must be solicited, received, and evaluated, and grants must be issued. Of course, monitoring projects in larger programs certainly will take substantially more personnel, and I am concerned that we fulfill this essential function. However, this leads to a related observation. Small, sharply targeted programs may require staff out of proportion to the size of the appropriation and the impact of the program.

Table 2 shows the relationship of positions to appropriations for a wide variety of elementary and secondary education programs. Without defending each staffing pattern it is safe to say--as the Chairman has indicated--that there is no direct correlation between appropriation and staff size. The real problem here is that we have a large number of small programs which are organizationally isolated. This tendency is quite understandable from the point of view of the separate interest groups but it does fly in the face of another very real problem: we have, in OE, limited resources both in program administration dollars and position allocations to manage a very complicated program structure. To illustrate just how complicated our situation is you should know that not only do we have an overall budget to administer in excess of $10 billion and well over 100 separate programs we also deal with:

-- 50 separate State departments of education plus outlying areas
--16,000 separate school districts
-- 3,000 colleges and universities

Last year, we:

--received 63,875 applications
--awarded 43,493 grants and contracts
--wrote 258 Rules and Regulations
--processed 1,386 audit reports.

In addition we have thousands of meetings with constituents and are concerned with some 60 million students.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

	Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
			Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
	Programs for migratory children (OMB 13.429)	Elementary and Secondary Education Act, Title I, Sec. 122	15	1.7	1.7	131	2.8	2.8
2.	Programs for disadvantaged children (OMB 13.428)	Elementary and Secondary Education Act, Title I	61	7.1	8.8	1,721	36.8	39.6
3.	Vocational education - basic programs (OMB 13.493; 13.494; 13.495; 13.499; 13.501; 13.558)	Vocational Education Act of 1963, Parts B, F, G, H, J, and Sec. 102(b) and 104	77	9.0	17.8	535	11.4	51.0
4.	School maintenance and operation (OMB 13.478)	School Assistance in Federally Affected Areas (PL 81-874)	94	10.9	28.7	768	16.4	67.4
5.	Indian Education (OMB 13.534; 13.551)	Indian Education Act (PL 92-318)	21	2.4	31.1	25	.5	67.9

* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY

EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

		Positions Allocated			Appropriation		
Type of Assistance	Authorizing Legislation	Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
6. Desegregation assistance (OMB 13.525; 13.526; 13.528; 13.529; 13.530; 13.531; 13.532; 13.405)	Emergency School Aid Act, Title VII (PL 92-318) and Civil Rights Act of 1964, Title IV	158	18.4	49.5	275	5.9	73.8
7. Supplementary educational centers and services, guidance counseling, and testing for the handicapped (OMB 13.519)	Elementary and Secondary Education Act, Title IV-C	Included in 13.571, Educational innovation and support			20	.4	74.2
8. Education for the handicapped (OMB 13.444; 13.445; 13.446; 13.450; 13.451; 13.452)	Education of the Handicapped Act, Parts C, D, and F	62	7.2	56.7	111	2.4	76.6
9. Community schools (OMB 13.563)	Education Amendments of 1975, Special Projects Act, Sec. 405	7	.8	57.5	4	.1	76.7
10. Bilingual education technical assistance coordination (OMB 13.403)	Elementary and Secondary Education Act, Title VII	Included in 13.403, Bilingual education			4	.1	76.8

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* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated: Number	Positions Allocated: Percent 1/ of total	Positions Allocated: Cumulative percent	Appropriation: Dollars (millions)	Appropriation: Percent of total	Appropriation: Cumulative percent
11. Bilingual education (OMB 13.403)	Elementary and Secondary Education Act, Title VII	60	7.0	64.5	98	2.1	78.9
12. Women's educational equity (OMB 13.565)	Education Amendments of 1974, Special Projects Act, Sec. 408	3	.3	64.8	7	.2	79.1
13. Career education (OMB 13.554)	Education Amendments of 1974, Special Projects Act, Sec. 406	19	2.2	67.0	10	.2	79.3
14. Ethnic Heritage Studies (OMB 13.549)	Elementary and Secondary Education Act, Title IX	5	.6	67.6	2	-	79.3
15. Gifted and talented children (OMB 13.562)	Education Amendments of 1974, Special Projects Act, Sec. 404	6	.7	68.3	3	.1	79.4

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* Allocation as of 5/1/77

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NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY
EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriatio		
		Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
Adult education (OMB 13.400)	Adult Education Act	32	3.7	72.0	81	1.7	81.1
17. Follow Through (OMB 13.433)	Community Services Act (PL 93-644) Title V	29	3.4	75.4	59	1.3	82.4
18. Indian education (OMB 13.536)	Indian Education Act (PL 92-318) Title IV, Part C (Sec. 314 Adult Education Act)	3	.3	75.7	4	.1	82.5
19. Educational innovation and support (OMB 13.571)	Elementary and Secondary Education Act, Title IV-C	36	4.2	79.9	185	4.0	86.5
20. Programs for the handicapped-aid to states (OMB 13.449)	Education of the Handicapped Act, Part B, as amended by PL 94-142	45	5.2	85.1	200	4.3	90.8
21. Teacher Corps (OMB 13.489)	Higher Education Act, Title V	39	4.5	89.6	38	.8	91.6

* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
		Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
2[illegible] Programs for children in state institutions for the neglected and delinquent (OMB 13 [illegible]31)	Elementary and Secondary Education Act, Title I, Sec. 123	7	.8	90.4	29	.6	92.2
23. Library and learning resources (OMB 13.570)	Elementary and Secondary Education Act, Title VI-B	20	2.3	92.7	147	3.1	95.3
24. Right to Read (OMB 13.533)	Education Amendments of 1974, National Reading Program, Title VII (PL 93-380 as amended by PL 94-194)	26	3.0	95.7	26	.6	95.9
25. Indian education (OMB 13.535)	Indian Education Act (PL 92-318) Title IV, Part B	8	.9	96.6	13	.3	96.2
26. Programs for the handicapped in state-supported schools (OMB 13.427)	Elementary and Secondary Education Act, Title I, Sec. 121	Included in 13.449, Programs for the handicapped - aid to states			111	2.4	98.6

* Allocation as of 5/1/77

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NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
		Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
27. Incentive grants (OMB 13.512)	Elementary and Secondary Education Act, Title I, Part B	Included in 13.428, Programs for disadvantaged children			25	.5	99.1
28. State administration of ESEA, Title I programs (OMB 13.430)	Elementary and Secondary Education Act, Title I	1	.1	96.7	21	.5	99.6
29. State equalization grants (OMB 13.572)	Education Amendments of 1974, Title VIII, Part D, Sec. 842	7	.8	97.5	11	.2	99.8
30. Packaging and dissemination (OMB 13.553)	Education Amendments of 1974, Sec. 402, Special Projects Act and the General Education Provisions Act, Sec. 422(a)	13	1.5	99.0	10	.2	100.0
31. Metric education (OMB 13.561)	Education Amendments of 1974, Special Projects Act, Sec. 403	6	.7	99.7	2	-	100.0
	TOTAL	860	100		4,676		

* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

When new programs are launched we frequently have to take personnel from an existing program, or programs, leaving the latter in a weakened position and only minimally manning the new. Under current staffing arrangements such supervision is extremely difficult. While we have had some substantial ceiling increases in recent years these have almost all gone to strengthening enforcement activities related to the default, fraud and abuse conditions in our student financial aid programs.

The answer not only involves more staff; it also relates to a fourth principle of administration: *Insofar as possible small discretionary programs should be clustered together so that administration and accountability of such programs can be better coordinated and duplicative staff assignments reduced*. We hope Mr. Chairman to submit for your consideration just such a proposal.

Paperwork Burden

Having talked about our objectives, program structure and the organization of the Office I'd like to move on to a still more specific issue--the problem of paperwork which is acutely felt, I suspect, by everyone in this room. I have faced it at the State level and at the college level and now I face it even more in Washington. In spite of our elaborate telephone networks, everything we do ultimately, it seems, is put on paper--with carbons for everyone. Ultimately, the storage problem of all this paper may be solved by microfilm and microfiche, by computer tapes or discs, which may help future generations, but this is of small comfort to those of us who must fight an avalanche of paper every day. I am convinced one can attack this problem and we've already cut back in the paperwork within OE. Several months ago Secretary Califano announced that we will no longer require two application forms from students and their families applying for a Basic Grant and a campus-based program. This will eliminate 2 million forms every year. Also we have cut out a complicated reapplication form required of colleges and universities administering the campus-based student assistance programs. Thousands of hours will be saved. Further, we soon will announce a sharp cutback on the application report forms we require from the schools.

Ultimately, however, unless we are willing to place more trust in the various agencies, we will not attack this problem at its root. We must strike a proper balance between reasonable accounting and excessive demands for reports which very often are never read.

Also we must recognize that some of the paperwork burden can be traced directly to legislative requirements illustrated perhaps by the elaborate State planning process established for vocational education in last years education amendments. But even without these requirements the paperwork needed to award grants, verify expenditures, and provide an audit base for assuring proper use of Federal funds is tremendous. And I must admit that some of the Office of Education's own self-generated procedures are excessive.

In short I agree that we have a problem and like the protection of liberty, only "eternal vigilance" will prevent us from being drowned in paper. I have established a policy within OE--and I intend to enforce it--that we will require only the information and reports which are "absolutely necessary". After all, this is a problem we created and I believe its one that together we can solve.

Regulations Process

Closely related to the paperwork problem is the matter of rules and regulations. Your displeasure with past delays in this process has resulted in Section 431 of the GEPA which prescribes a fairly rigid timetable for the development of regulations after passage of new or amended legislation. I must admit that a 240 day publication period--or almost 8 months--does not seem unreasonable, but in spite of intensive efforts the Office of Education has only occassionally been able to meet this deadline. I don't like to be in a position of not meeting legislative mandates, and I have moved to break the logjam. First the rules and regulations management has been given to Executive Deputy Commissioner Pierce. He has been charged with the development of a clearly established timetable and he is to monitor it with vigor. The attached charts (Appendix A) illustrate other improvements we hope to make, as well as providing an overview of the process.

Let me say in summary that if we can get all of these procedures in place, the timetable will be improved but we undoubtedly will still have to rely on "circumstances unforseen" to request a modification in our initially submitted schedule. A large part of the problem is the sheer number of packages of regulations which are required as a result of the large omnibus education acts now passed by the Congress each two years, to say nothing of some fairly substantial laws, such as P.L. 94-142, Education of All Handicapped Children Act, which occur between. When we are hit with 44 packages at once, the manpower demands are tremendous, and the clearance channels occasionally become almost completely clogged.

In conclusion I'd like to highlight two specific items related to the preparation of regulations. First while we follow the "circumstances unforeseen" rescheduling procedure, the Committees have never formally approved the resubmitted schedules. This puts me in technical noncompliance and may create legal problems for us. I would prefer Committee approval or consideration of an approach which, for example, might require a Committee veto instead of positive approval.

Second, I would suggest that a close look be given to the 45 day Congressional review period required before final regulations become effective. No action has ever been taken by Congress under the authority and it has caused some mutually shared inconvenience. This schedule simply adds another 45 days (or more in case of certain adjournments) to an already lengthy period of regulations development. We do try to follow Congressional intent and keep you informed as the regulations are developed through supplying of drafts and consultation with staff. In addition, Congressionally generated comments are given full consideration in our public comment period. Finally, and we would hope this would not be necessary, the Congress can always remedy any substantial variation by changing the law.

These specific comments may not go to the heart of the matter but their resolution could help. I look forward to working with you to see if we can develop an acceptable approach which combines tight control on our side, with appropriate flexibility on yours.

And now Mr. Chairman I would like to look at several smaller more specific issues.

Tydings Amendment, Sec. 412(b)

The so-called Tydings Amendment, Sec. 412(b) of the GEPA was enacted to provide relief for a situation in the early seventies when appropriations were received so late in the fiscal year that it was virtually impossible for State or local educational agencies to effectively spend the funds. The authority provided an additional year for educational agencies and institutions to obligate and expend Federal funds beyond the year actually received.

Our legal counsel has always viewed this authority as applying only to formula grant programs and not discretionary grant programs. The reason for this is that discretionary grant programs are generally forward funded so that at least a full year is allowed for obligation and expenditure. It is also possible under existing rules to allow expenditures for project grants which meets the Comptroller General's "current need" test to go beyond that year. In some research programs, funds remain available for up to five years. In these cases, if the Tydings Amendment were applied, it would become a "restrictive" rather than a "relief" instrument. Nothing in its legislative history would indicate that intent.

Since most of our State formula grant programs are now "advance-funded" the Tydings Amendment may no longer be as necessary. In effect, since our "advance-funded" programs become available on July 1 before the beginning of the fiscal year for which they were appropriated, there is an actual period of 27 months which is available for expenditure, whereas there would be an adequate 15 month period without it.

Appeals Process, Section 425 of GEPA

There have been three appeals under Section 425 of GEPA since the enactment of P.L. 93-380 in 1974. Two of these appeals involved Title I, ESEA programs, one from Pennsylvania and one from Missouri. In both cases the record of the appeal before the State educational agency and the decision of the hearing official were reviewed, and the appellants and the State educational agencies were given the opportunity to file a brief with the Commissioner before a determination was made. In both cases the decision of the State educational agency was upheld.

One appeal has involved Title IV of ESEA, Part C, Innovation. The appeal of the Saugus, Massachusetts public schools is from a final decision of the State educational agency denying the LEA's application for FY 1977 on the grounds that the LEA's proposal failed to satisfy a local financial commitment requirement contained in the Massachusetts State Plan. We have obtained the information necessary to complete the record and our General Counsel Unit is reviewing the record.

While the experience to date does not indicate a serious problem or burden for the Commissioner, this provision has the potential for creating a serious administrative load for the office.

Responsibility of States to Furnish Information, Section 437 of GEPA

Section 437 of the General Education Provisions Act requires an annual report from the Commissioner of Education to the Congress on State uses of Federal education funds, under the State administered Federal education programs.

The second annual report collected data from the States concerning the allocation of their grants and contracts made in Fiscal Year 1976, and concerning expenditures of grants and contracts by local, public, and private agencies by purpose for funds allocated in Fiscal Year 1975.

By statute, reports from the States were due on December 31, 1976. Most of the reports were not received until after that date; the last complete reports from two States were received in July, 1977. The Office of Education has been processing the collected data, analyzing it, and preparing a summary report, despite delays in receipt of data. Computational work will now be completed in August; the report itself will be submitted several weeks later.

As a final part of my testimony I would like to discuss two general areas--legislatively mandated reports and the new maintenance of effort provisions.

Mandated Reports

In general terms we have no great difficulty with the concept of mandated reports and studies. We do find, however, that the due dates of mandated reports are frequently unrealistic, given the time involved in designing a study, going through the contract-procurement cycle, implementing the study (which includes the still-growing, enormously burdensome and time-consuming series of forms clearances that we must go through), and reporting findings. Let me point out that forms clearance, which used to require 2 or 3 months, now is likely to require 4 to 6 months as a result of requirements resulting, ironically, from legislative and administrative efforts to reduce the Federal paperwork burden on respondents. The consequence again is that studies are delayed or postponed and are quite frankly less useful.

Part of the difficulty with due dates, I have been told, has been the extended time sometimes taken to pass legislation--a reporting date established at an early period when a bill was drafted is not adjusted at final passage or conference time. Consultation between our staffs should eliminate most of those problems.

I also understand that legislative specifications for mandated studies occasionally overlap studies that we have already planned or may already have begun. The result may be difficult adjustments or formal amendments to the scope of work of a study or last minute upheavals in our Evaluation Plan. Here again, we need early discussions so that we may make adjustments to our studies or plans.

These comments apply essentially to the one-time reports and studies. For the ongoing annual reports, we still have some difficulty in meeting deadlines, but these are internal problems. Dates in most cases have been adjusted to a reasonable basis. You may wish to examine the current required date of September 30 for the Renewal Evaluation Report submitted by the Assistant Secretary for Education in the light of the Budget Reform Act that requires us to submit our legislative recommendations to you four and one-half months earlier on May 15. The Assistant Secretary believes the two actions should logically be related. For your information, I am attaching as Appendix B a listing of the currently mandated reports and studies.

We would appreciate any reactions you have to the reports. If any are not useful, I want to know, and if they cannot be made useful then I would assume that the requirement for those reports should be repealed. I understand that we have had relatively little response to most of them and that late reports sometimes go unnoticed, which may or may not be an indicator of their value. Relating to the earlier paperwork discussions, I am not sure we can afford unused reports even if they don't place a burden on State and local agencies.

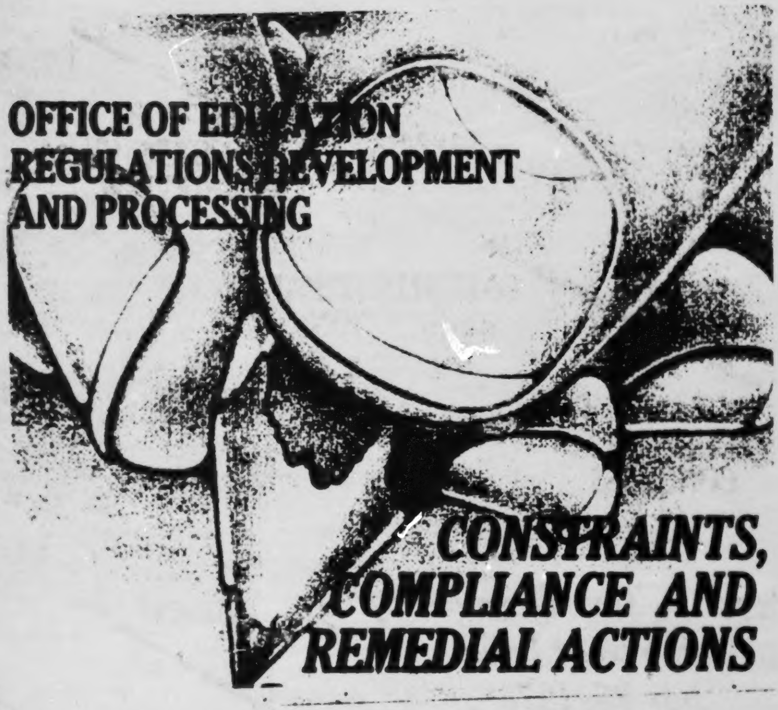
Maintenance of Effort Provisions

Development of the new regulations for maintenace of effort under Titles I and IV of ESEA and the Adult Education Act has moved more slowly than we anticipated and final regulations are not now expected until November. There has only been one appeal for a waiver to date.

In conclusion, I must tell you how grateful we are not only for your splendid cooperation in the past but most especially for these hearings which have focused in such a constructive and candid way on the administration of these essential programs. We appreciate very much your concerns and we pledge to you our full cooperation in seeing to it that the Federal education programs are well administered. Our central goal is to make sure that schools are enriched and the children of this country are well served. We must remove all barriers which get in the [illegible] of good education. We are convinced that as we work together these purposes can be achieved.

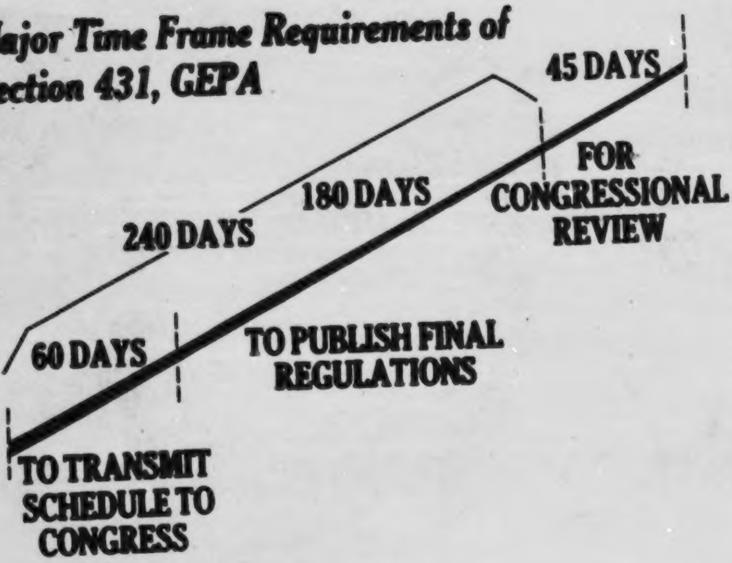
I shall be pleased to respond to your questions or comments.

Appendix A



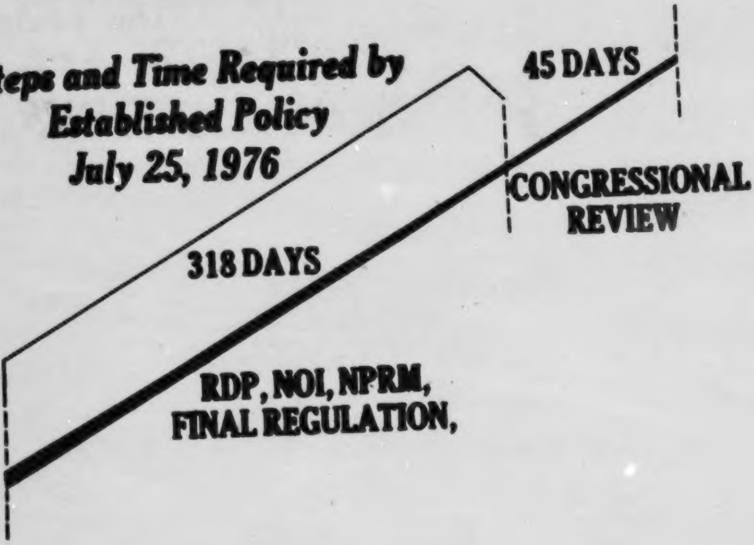
OFFICE OF EDUCATION
REGULATIONS DEVELOPMENT
AND PROCESSING

CONSTRAINTS,
COMPLIANCE AND
REMEDIAL ACTIONS



Major Time Frame Requirements of Section 431, GEPA

45 DAYS
180 DAYS
240 DAYS
FOR CONGRESSIONAL REVIEW
60 DAYS
TO PUBLISH FINAL REGULATIONS
TO TRANSMIT SCHEDULE TO CONGRESS



Steps and Time Required by Established Policy July 25, 1976

45 DAYS
CONGRESSIONAL REVIEW
318 DAYS
RDP, NOI, NPRM, FINAL REGULATION,

Remedial Actions

I. Drafting for:

- *Simplicity and Clarity But Definitive*
- *Avoiding Over Regulation*
- *Avoiding Additional Data Acquisition Burden*

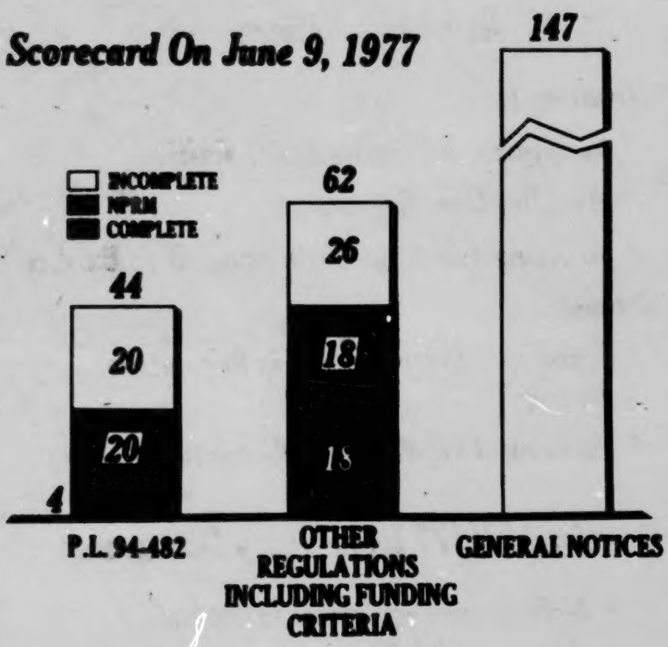
Through:

- *Training of Program Staff in Regulation Writing*
- *Training of Legal Staff in Regulation Writing*

Required FY '77 Regulatory Documents

- *44 Program Regulations to Implement Public Law 94-482*
- *62 Other Program Regulations*
- *12 Sets of Funding Criteria*
- *147 General Notices (Announcements)*
  - *Closing Dates*
  - *General Announcements*
  - *Audit Hearings*
  - *Public Hearings*

Scorecard On June 9, 1977



Process Variables

(EXAMPLE: P.L. 94-482 DATA)

ACTIVITY	OS APPROVED PROTOTYPE	RANGE	ACTUAL (AVERAGE)
NPRM			
Drafting, Rewriting, Etc.	30	98-159	126
OE/ASE Approval	10	13-62	32
OS Approval	10	6-65	26
Secretarial Approval	7	1-47	24
Publication in FEDERAL REGISTER	5	5-11	7

Additional Problems

- *Approval Process - Serial Review in OE/OS*
- *Previous Refusal to Delegate Authority on NPRM*
- *45 Day Public Comment Period - vs 30 Days by Law*
- *NPRM Must Traverse Entire System For Comments Prior To Publication - vs Parallel Review*
- *Final Regulations Must Traverse Entire System Even When No Revisions From the NPRM*

I. Regulations Task Force For Improved Techniques

- *Managing the Development Process*
- *Drafting for Clarity and Utility*
- *Processing in a Timely Manner*
- *Training Regulation Writers and Attorneys*

II. Monitoring The System FY'78

OE Is Developing A Formal Tracking System for:

- ***Regulations Development and Processing, Forms Design and Clearance***
- ***Programmatic Activities Necessary to the Grant Awards Process***
- ***The Required Activities of the Grant and Procurement Management Division***

III. Moratorium

- ***OE Is Considering: Implementing a Moratorium on All Regulation Revisions for FY '78.***
- ***Publishing One Time (September 1) A Closing Date Notice for Receipt of Applications for Discretionary Programs.***
- ***A Minimum of 60 Days for Clients to Prepare Application Packages.***
- ***Stagger Receipt of Applications to Even Workload and Complete Awards by End of Third Quarter.***

PROBLEMS

- ***Preparation and Clearance of Application forms -OE-HEW-OMB***
- ***Preparation and Printing of Information Packages***

Improved Administration

Plans to Combine Functions of the Early Stages of the Grant Award Process:

- Regulation Development and Processing
- Grant Application Form Design and Approval
- Grantee Information Package Development
- Tracking and Monitoring

Objectives FY '78

- 1st Quarter - Complete the Contract and Grant Awards for Those Programs and Projects That Are Not Time Critical Due to School Year
- 2nd Quarter and 3rd Quarter - Spread the Completion of the Contract and Grant Awards for All Other Programs and Projects Equally Over the Two Quarters
- 90% of the Awards Will Be Completed by the End of the 3rd Quarter

12/21/76

Appendix B

Congressional Reports

	Report	Legis. Ref.	Legis. Due Date	Designated/ Assigned Responsibility
1.	Commissioner's Annual Report	GEPA, Sec. 422(b)	6/30	Commissioner OPA
2.	Women's Educational Equity Program	P.L. 93-380, Sec. 408(f)	End of each fiscal year; 9/30	Commissioner WPS
3.	SAFA	P.L. 81-874, Sec. 401(c)	To be submitted with Commissioner's Annual Report; 6/30	Commissioner DCES
4.	ESAA	P.L. 92-318, Sec. 714	"Due no less than than two times annually."	ASE DCES
5.	Catalog of Federal Education Assistance	GEPA Part C, Sec. 423	To be submitted with Commissioner's Annual Report; 6/30	Commissioner DCM
6.	OE Personnel Requirements	GEPA, Sec. 403	2/1	Commissioner DCM
7.	Plan to Encourage States to Establish Guarantee Agencies	P.L. 94-482, Sec. 421(c)	180 days after enactment of P.L. 94-482; 4/12/77	Commissioner DCM (lead) (DCP review only)
8.	Report on Plan to Encourage States to Establish Guarantee Agencies	P.L. 94-482, Sec. 127(a)	6/30/77	Commissioner DCM (lead) DCP
*9.	Status of Vocational Education	P.L. 94-482, Sec. 112(c)	9 months after end of each fiscal year; 6/78	Commissioner DCOAE (lead) (DCP review only)
10.	National Technical Institute for the Deaf	P.L. 89-36	Annual	Secretary DCEH
11.	Activities of Centers on Educational Media and Materials for Handicapped	P.L. 94-142	Annual	Secretary DCEH

.	Progress Made To-rd Providing Free ppropriate Public Education to All Handicapped Children	P.L. 94-142, Sec. 618(a)	120 days after close of each fiscal year; 1/31/79	Commissioner DCEH
3.	Condition of Bilingual Education in the Nation	ESEA, Title VII, Sec. 731(c)	11/1/76 2/1/78 (twice only)	Commissioner OBE DCP (review)
.4.	BEOGs, Multiple State Processing Experiment	P.L. 94-482, Sec. 121(i)	90 days after termination of agreements with States which are to begin after July 1, 1977	Commissioner DCPE (lead) (DCP review only)
15.	Annual Fellowship Report	P.L. 94-482, Sec. 971(a) and (b)	120 days after end of each fiscal year; 1/28/78	Commissioner DCPE (part a) DCP (part b)
16.	Veterans Cost-of-Instruction Payments	P.L. 94-482, Sec. 126(d)	90 days after enactment of P.L. 94-482; 1/12/77	Commissioner DCP (lead) DCPE
17.	Findings and Proposals for Improving Use and Quality of Part-time EPA Personnel	P.L. 94-482, Sec. 493(B)	10/1/77	Commissioner DCP (lead) DCPE
18.	Status of Bilingual Vocational Training	ESEA, Title VII, Sec. 723	Annual report; no date specified	Commissioner Secretary of Labor DCP
19.	State Use of Federal Funds	GEPA, Sec. 437	3/31	Commissioner DCP
20.	Sex Discrimination and Sex Stereotyping in Vocational Education Programs Assisted Under VEA of 1963	P.L. 94-482, Sec. 523(a)	2 years after enactment of P.L. 94-482; 10/12/78	Commissioner DCP

*Special Projects Expenditure Plan	Special Projects Act, Sec. 4(b)(1)	3/1	Commissioner DCP
Annual Evaluation Report	GEPA, Sec. 417	11/1	ASE DCP
Expiring Program Legislation	GEPA, Sec. 418	"Not later than one year prior to date of such expiration."	ASE DCP

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*Not due until 1978/79.

CURRENT MANDATED STUDIES - P.L. 94-482 and P.L. 93-380

P&E Funds

P.L. 94-482	**FY 77 Funds**	**FY 78 Funds**
1. Impact of Bilingual Vocational Training Programs	250,000	200,000
2. Evaluation Models for State Vocational Education Administrators	350,000	
3. A Review of the Veterans Cost-of-Instruction Program	65,000	
4. A Study of State Requirements for Forming State Guarantee Agencies in the Guaranteed Student Loan Program	400,000	450,000
5. A Study for Establishing Consumer Protection Strategies (cont.)	50,000	
6. A Study of Graduate Fellowships and Assistance	120,000	
7. A Study of the Impact of Student Financial Aid Programs: Phase III	550,000 *	500,000*
P.L. 93-380		
1. Development of a System to Report State and Local Uses of Federal Evaluation Funds	300,000	250,000
2. Evaluation of ESEA Title I Program in State Institutions for Neglected or Delinquent Children	710,000	600,000
3. Study of State of Bilingual Materials Development and Transition of Materials to Classrooms	206,000	

* 1/5 of funds support mandated portion of study

Program Funds

P.L. 94-482	FY 77 Funds	FY 78 Funds
1. An Assessment of Sex Stereotyping in Vocational Education Programs	800,000 (voc. Ed)	
P.L. 93-380		
1. Impact/Process Evaluation of the Community Schools Program	100,000 (Community Schools Advisory Council)	100,000 (Community Schools Advisory Council)

Dr. BOYER. Thank you, Mr. Chairman and members of the committee.

We, too, are pleased to be here to discuss the administration of the Education Acts administered by our office.

I should indicate at the outset that organizations are essential, primarily because these are the vehicles by which we get our funds to people. I am concerned about good organization and about good administration in order to make sure that these dollars go to the classrooms and relate to the children for which the goals are intended.

The first major point you made, Mr. Chairman, has to do with the purpose of education at the Federal level. I think it is important to stress that while the Federal Government has grown enormously in its commitment to education, we have in this country, of course, an educational system that is still rooted at the local level and coordinated by the States.

I think it is absolutely central that we understand that the Federal Government maintains a junior partnership in the role of education in America.

You ask what its role is and has it become blurred. That question has occupied me considerably since I have come to the Federal Government. I find we do have $10 billion in Federal monies going to education. We have 120 separate programs in the Office of Education. We must deal with 50 separate State agencies and the outlying territories. We are related to 16,000 separate school districts and 3,000 colleges and universities, plus a larger number of proprietary schools.

Last year the Office of Education had approximtaely 63,000 applications received in our office in application for grants. That averges about 240 applications every working day. We awarded 43,000 grants and contracts last year. That is 170 awards every working day. We wrote 258 rules and regulations. No one rejoiced in that fact, but there it is. We processed 1,380 audit reports that came to us and you can calculate how many that is every working day.

In addition, Mr. Chairman, we have an obligation to maintain contact with thousands of constituencies all across the country. That is an enormous amount of business that is carried on in the name of education.

The question that you pose is the one that perplexes me. To what end is this directed or is it scatter shot? Are we engaged in pouring water in a sand box?

As an exercise during our recent zero-based budget hearings, I, with the staff, took the 120 programs and tried to see whether there was any clustering, whether any purpose could be inferred from all of these programs. I was somewhat relieved to find that—in my analysis, at least—Federal purposes do indeed exist.

The largest number of programs that clustered together related to what we called expanding access to education.

[Chart shown -"I - To Expand Access."]

It seemed to me that a number of our programs are indeed to support expanding access to education, which I consider to be a Federal obligation. It includes, for example, the bypassed student. It seems to me the recent legislation for the handicapped is an effort at the Federal level to make sure a group of our children are not bypassed and we are encouraging that by law and resources.

A second major category is the college students. Our recent commitments to grants and loans is an attempt to avoid having some of our young people lose the opportuity for education because of background or financial inability to pay.

A third group ties into our adult literacy program, that is, picking up a population that has lost educational opportunity. I would like to give some encouragement to the fact that one of the major purposes in Federal involvement in education today is to encourage access to what we consider to be a fundamental social enterprise in this society—at the lower grades, at the college level, and for adults.

[Chart shown-II "To Promote Excellence".]

This is to promote what one might call minimum excellence. Under title 1, of the Elementary and Secondary Education Act especially as those moneys are targeted toward basic skills, it seems clear to me that what we are seeking to do is to encourage a basis of minimum adequacy.

[Chart shown - "II, To Promote Excellence."]

We have grouped a number of our programs under promoting excellence. This appears in terms of teacher training, Teacher Corps, teacher centers, in terms of building library resources. Incidentally, I was visiting at a school in Kentucky a month or two ago and I asked them to show me the library. We visited the library and I went to the card catalog and found that every one of their books that had been purchased through Federal funds had a little red tag in the corner. As I looked at the library resources in that school in Kentucky, it was clear to me that without Federal help they would have virtually no library materials, or enrichment materials to help the children.

I consider that an important development.

A large part of our money is related to promoting educational excellence.

[Chart shown - "III, To Encourage Equal Funding."]

The third area is, to encourage equal financing. I know this is a much more difficult area, but it seems to me the Impact Aid program—a not-unfamiliar issue here—is an attempt to compensate where Federal involvement has actually reduced the effectiveness of the financing in that district.

[Chart shown - "IV, To Respond to National Need/Emergencies."]

I inferred from existing programs three other purposes. I think the Federal Government has an obligation to respond to national needs and national emergencies as they come along.

A lot of the emergency actions that followed the Sputnik program indeed related to this major mandate.

The ESAA money seems to indicate Federal intervention to respond to a continuing national need.

[Chart shown - "V, To Assess the Status of Education.]

The next one is probably the oldest. The U.S. Office of Education was created to monitor the status of education in America, to assess the health in American education, to keep the records, to report on its well-being.

That continues under our efforts of planning and evaluation and the Commissioner's Annual Report.

[Chart shown - "VI - To Stimulate New Directions."]

[Charts referred to follow:]

I. TO EXPAND ACCESS

The Bypassed Student

- Handicapped
- Indian Education
- Bilingual Education

College Students

- Grants: Basic
  - Supplemental
  - State Scholarships (Incentive)
- Loans: Guaranteed
  - Direct
- Work Study
- Trio: Talent Search
  - Upward Bound
  - Special Services
- Veterans Cost of Instruction
- CLEO

Excluded Adults

- Adult Basic Education

II. TO PROMOTE EXCELLENCE

Basic Skills

- Title I
- Right to Read
- Follow Through

Teacher Retraining

- Teacher Corps
- Teacher Centers

Library Resources

- Public Libraries
- School and College Libraries

New Technology

- ETV
- Educational Broadcasting Facilities

III. TO ENCOURAGE EQUAL FUNDING

Schools

- "Impact" Aid (A)
  (B)

Colleges

- Black Colleges
- Developing (Non-Black)
- Land Grant Universities

IV. TO RESPOND TO NATIONAL NEEDS/EMERGENCIES

Desegregate the Schools

- Emergency School Aid

Special Educational Programs

- Drug Abuse
- Environmental Education
- Consumer Education
- Metric Education
- Art Education
- Women's Educational Equity

Education and Work

- Vocational Education
- Career Education

V. TO ASSESS THE STATUS OF EDUCATION

- Planning and Evaluation

VI. TO STIMULATE NEW DIRECTIONS

Federal leadership in neglected areas

- Gifted and Talented Children
- The Arts and Education
- Womens' Equity

Systemic reform of the education system

- Content -- The Core Curriculum
  - 3 R's (Reading, Writing, Arithmetic)
  - 3 E's (Energy, Environment, Engagement); (TV)

Personnel

Teachers, Administrators, specialists at all levels in the education system

Office of Education staff

Structure

Extended High School

Education and Work

Dr. Boyer. The final purpose seems to change from year to year and certainly decade to decade. I believe the Federal role in education is to help stimulate new directions.

I have my own ideas as to what those new directions are, but I will say by illustration I think we must promote always, by illustration at least, new trends that keep the schools in touch with changing realities.

Those are some observations.

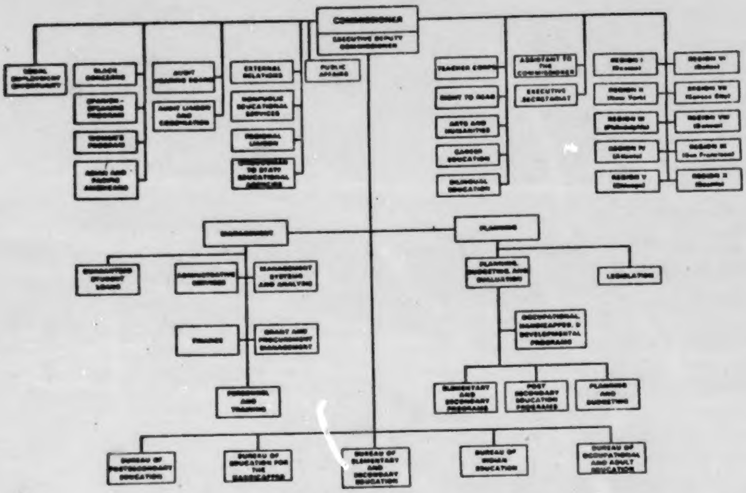
Mr. Chairman, I should say to pretend to fit the 120 programs into those six categories takes a little doing. Occasionally the pattern is strained and the cloth doesn't fit the pattern in all instances. I think we have some programs that slop over and it takes a little wrenching to fit them in these goals, but I think the goals I have stated are not unreasonable for Federal effort as we enrich, not supplant, the efforts of local schools.

Let me talk then about the administrative structure we have in OE to try to carry out this mandate.

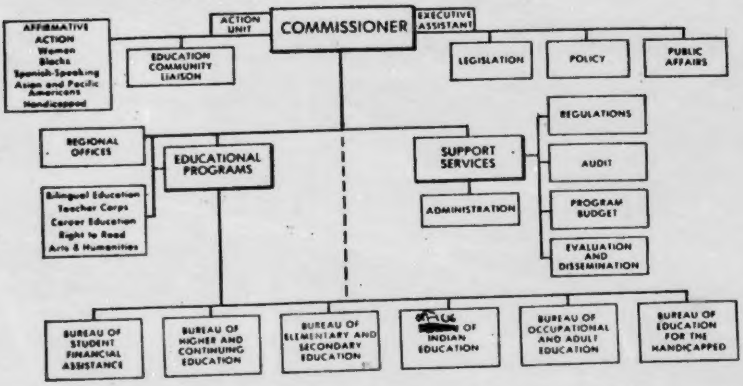
I have been deeply concerned that we have a structure that works. One of the first things I did was to reorganize the Office of Education.

[Chart shown - "OE Proposed Functional Reorganization."]

OE: PAST ORGANIZATION


COMMISSIONER
EXECUTIVE DEPUTY COMMISSIONER
EXTERNAL RELATIONS
PUBLIC AFFAIRS
TEACHER CORPS
RIGHT TO READ
ARTS AND HUMANITIES
CAREER EDUCATION
BILINGUAL EDUCATION
ASSISTANT TO THE COMMISSIONER
EXECUTIVE SECRETARIAT
MANAGEMENT
PLANNING
LEGISLATION
FINANCE
BUREAU OF INDIAN EDUCATION
BUREAU OF OCCUPATIONAL AND ADULT EDUCATION

OE: PROPOSED FUNCTIONAL REORGANIZATION


ACTION UNIT
COMMISSIONER
EXECUTIVE ASSISTANT
AFFIRMATIVE ACTION
Women
Blacks
Spanish-Speaking
Asian and Pacific Americans
Handicapped
EDUCATION COMMUNITY LIAISON
LEGISLATION
POLICY
PUBLIC AFFAIRS
REGIONAL OFFICES
EDUCATIONAL PROGRAMS
Bilingual Education
Teacher Corps
Career Education
Right to Read
Arts & Humanities
SUPPORT SERVICES
ADMINISTRATION
REGULATIONS
AUDIT
PROGRAM BUDGET
EVALUATION AND DISSEMINATION
BUREAU OF STUDENT FINANCIAL ASSISTANCE
BUREAU OF HIGHER AND CONTINUING EDUCATION
BUREAU OF ELEMENTARY AND SECONDARY EDUCATION
Office [redacted] OF INDIAN EDUCATION
BUREAU OF OCCUPATIONAL AND ADULT EDUCATION
BUREAU OF EDUCATION FOR THE HANDICAPPED

Mr. Boyer. I have pictured here a chart that highlights the major structure as it exists today.

The primary reorganization, however, occurred at the Commissioner's Office. I discovered that there were certain things I could do in the office. One, I could change the furniture around with very little objection from anyone and I accomplished that in the first week.

Next I was able to change a bit the Commissioner's Office, the staff.

I discovered there were more than 20 different staff offices reporting directly to the Commissioner and it seemed to me that that was a span of involvement that would probably weary us all pretty rapidly, so I tried to ask, what are the functions the Commissioner should have directly available to him. Those are the ones that appear in the top line horizontally. I won't recite them, but they are rather commonplace: public affairs, relationships with Congress, relationships with the education community and some affirmative action units that are in my office. They remain.

The other primary reorganization that occurred appears in those two yellow boxes. I am sorry the artist chose yellow for the Commissioner and the other two, but make of that what you will. I would have preferred a brassier color myself.

In any event, the executive deputies' offices have been divided. Instead of one executive deputy with total span of control, I created an executive deputy to monitor the educational programs. That deputy is to be accountable for all the work of the bureaus. A second executive deputy is to be responsible for all the support services which appear over to the right. These are services that have to be available to all the bureaus and it seemed to me we were absolutely cluttering ourselves trying to mix both direct program control and at the same time keep afloat all of these support services: monitoring regulations, monitoring audit, preparing the budget and getting our evaluation. So Bill Pierce is responsible for those very discreet functions and John Ellis is responsible as the chief education officer in OE to work with the deputies in each bureau.

Further, I should add that we created a new Bureau of Student Financial Assistance. Let me pause there long enough to say I think that is an illustration of how a bureau should be organized.

First of all, it is of sufficient size to be efficient and, second, it clusters together a variety of programs of common interest. It has a unity and integrity as to program and it has a size that makes it managerially defensible.

As a footnote, I would like to observe that over the years we have developed different purposes in forming these bureaus as I look at them. The student financial assistance represents program clustering. The Bureau of Higher and Continuing Education and Bureau of Elementary and Secondary Education represents layers of educational structure, a different approach.

In the case of Indian education and education for the handicapped, we have bureaus targeted on populations. This is just to illustrate that there are three or four different rationales that are used in organizing our bureaus.

Let me pause there to say we have organized at the Commissioner's level and created two deputies which I think improves management, but we have not yet engaged in any reorganization except for the new bureau at the bureau level.

I believe we need to do that, but I would remind you that quite a bit of the Office of Education organization is mandated by legislation. For example, the Office of Bilingual Education has been mandated by legislation. The Office of Career Education has been mandated by legislation. Indeed, the law says that office director must report to the Commissioner directly.

The Teacher Corps has been mandated by legislation.

The Office of Indian Education is legislatively mandated.

So is the Bureau of Occupational and Adult Education.

Further, in the case of occupational and adult education, there is a mandated deputy commissioner at GS-18 and it is mandated there are to be three GS-17s in that bureau. We have an Office of Libraries mandated and an Office of Environmental Education and so the story goes. Some 15 or 20 different organizational pockets within OE are there by law, frequently fixed at a given level by law and occasionally staffed by law, so the Commissioner is in those circumstances simply viewing an organization that has been predesigned.

Now, I don't feel totally discouraged by that fact—a bit humbled, perhaps—but I have tried in some early planning to ask if we could create some functional reorganizations within OE; that is, bring together out of these separate bureaucratic boxes the people who have some common educational interests. For example, we have scattered across the bureaus a number of staff people who are working on basic skills. We have scattered across the Bureaus a number of staff people who are working on teacher education.

Under our present fragmentation, they don't work together. They are isolated from each other. Very shortly I intend to announce the forming of some teams within the Office of Education that will bring together all of the principal staff who are working on basic skills, who are working on continuing education, who are working on secondary school education and have them form an internal reorganization simply by getting in the same room. When you reorganize, you don't have to remake the organization charts; you can just call a meeting.

That gets me to one other point that you talked about in your opening statement. You gave some examples of personnel assignments that seemed not very smart. I want to say that I am looking at the staffing arrangement within OE to make sure we don't have some people who are very much overworked and some who are underworked. That, I think, is an essential obligation that I have.

You did give an illustration, Mr. Chairman, in which you said that in one program that included several billion dollars there are 74 staff and in another that has several million we have 25 staff. I don't defend that.

I would say, however, that it is not the size of the program alone that determines the kind of staff you need. If it is a program where the dollars are flowing through and they are primarily administered at a state level or by a college, you need less staff than if it is a program where all of the administration must be carried on by us. If we have to get out the grants, review the applications, evaluate, and it is a program which we administer from start to finish, we may need more staff than if it is a flow through program I am not defending any particular example, but as a principle that needs to be kept in mind.

Further, I would make the point that even a small program needs a core staff. It is a lack of economy to be sure. If you have a million dollar program, it is still necessary for regulations to be drawn, applications to be prepared, grants to be reviewed, and some of the very small programs generate an enormous number of applications.

The question of economy of scale comes into play, which leads me to say that as I look at OE, one of our basic problems is that we have a great many programs that are small and isolated, some mandated and some that we have created ourselves, each with its own separate staff. It seems to me that the staff required in some of these is out of proportion either to the size of the appropriation or to the program impact in the field.

One of the areas in improving the management of the Office of Education relates very much to some greater efficiency in the way some of our discretionary programs become interrelated.

My generalization would be that insofar as possible small discretionary programs should be clustered together, programs should be better coordinated, and the duplication of staff reassigned. I might add that this is as much, Mr. Chairman, an obligation of the Commissioner as it is a modification of legislation, although both of these would come into play as we try to achieve that objective.

Let me shift now to the paperwork burden, the other point you have mentioned. I have tried to talk about goals; I have tried to talk about organization; and I have tried to discuss personnel briefly. The question of paperwork is just depressing to me, when I go to my desk, and more depressing when I go home—I mean because I take paper with me—not to bring domestic issues into the discussion, especially with my wife here.

I just think we face a crisis. We face a crisis not only in our office, but in others as well. I think we can attack this problem. We made it. We can unmake it in part.

Chairman PERKINS. I think that is a good statement, "We made it and we can unmake it."

Mr. BOYER. Let me illustrate some of the things we have done. We eliminated a duplicate form at the college level that will save parents and young people time by eliminating 2.5 million forms that we have generated in our process of multiple application for the basic grant and other related programs. We also cut back on the re-application requirements for the colleges administering the campus-based programs from about a 16-page form to about a 5-page form reducing what was several weeks' work to several days.

Very shortly I hope to announce two principles that are going to guide us in the future. We will not require schools who have made application for a grant that will continue to resubmit all of the information that they submit every year, which means they usually just mimeograph this and send it forward. Second, I hope to reduce to no more than one per year the report forms we require from the schools. I will have more information for you and your committee later, but as these principles are applied I think we are going to relieve the school systems enormously, both in the frequency with which they have to reapply for a grant that is ongoing—say Title I—and also the number of report forms that we expect them to send back, which is a burden for them to prepare and a double burden for us to read.

We can in fact congest the system to the point where the paper is meaningless. I think we have to measure the paper flow to what is humanly possible to be used and accountably monitored. I think this principle can go forward while at the same time our stewardship in this office is maintained.

As you know, some of the paperwork is legislatively mandated and that includes a number of the reports that we ask the states to send to us. I think we have to find a way to first cut down administratively on what we require and then highlight with your staff areas where we might get legislative change to disentangle it still further.

I repeat, it is a matter of great concern to me because if we don't free ourselves from this to some extent the credibility of government, the credibility of these programs will be affected. If the means become so onerous that they don't justify the ends, then I think we have probably destroyed the very things we are trying to promote. We have to think carefully about procedures.

The last point I would mention—and I am sorry to have been so extended in these remarks—is the business of regulation writing. Here again this has been a very heavy burden for the office. When I came I discovered there were 100 rules and regulations that were in process right then. How to move these along rapidly while still following a calendar for participation and still honoring the 45 days that are required for your review and doing all of that within the 240 days legally mandated time schedule seemed to me, given our staff circumstances, to be extremely difficult.

I checked into this and discovered that our average is not 240 days which the law requires, but 318 days. That has been the typical time from start to finish of the regulations. That includes the time for our consultation internally and externally, and then the 45-day wait.

The day before yesterday I sent a letter to all of our bureau chiefs and said I was declaring a moratorium on all regulation writing for the coming 12 months, except where the law mandates clearly a new regulation.

In other words, I do not expect our bureaus to take any initiatives to modify or tamper with a regulation unless they can prove to me it is absolutely essential in order to help the schools. I don't want us to take initiatives in such changes.

The 12 months' moratorium is precisely to let us have a breathing spell, to establish a new calendar and to make sure the writing of these regulations becomes simplified and that we can indeed meet the 240 days that are mandated. I think it is not beyond our reach, but the rules and regulations have to be timely and also have to be clearly written.

That concludes my statement, Mr. Chairman.

I do have available for your committee a nine point plan which indicates how we in OE are moving to administer each of the areas that I have mentioned, but rather than introduce it now, I will simply conclude by thanking you once again for your concern. We will respond as you wish to your questions.

Chairman **Perkins**. We will withhold our questions until we hear from Dr. Relic.

STATEMENT OF DR. PETER D. RELIC

[The prepared statement of Peter Relic follows:]

Statement by
Dr. Peter D. Relic
Deputy Assistant Secretary for Education
Wednesday, August 3, 1977

Mr. Chairman:

I have been asked to testify today about four major topics: 1) The organization of the Education Division; 2) The reorganization of the National Center for Education Statistics pursuant to the 1974 and 1976 Education Amendments; 3) Secretary Califano's plans to reshape the regional offices; and 4) Our plans to revitalize the Federal Interagency Committee on Education. Let me take each in turn.

THE ORGANIZATION OF THE EDUCATION DIVISION

Secretary Califano submitted to Congress on June 30 a report on reorganization of the Education Division, as required by Section 522 of Public Law 94-482. In it, he summarized the roles and responsibilities of the leaders of the agencies within the Education Division; indicated the changes that have been made within existing statutory restrictions to improve the functioning of the Education Division; and noted that the recent Congressional enactment of the Reorganization Act of 1977 and the subsequent Presidential effort to carry out a government-wide reorganization project would make it unwise to recommend any further reorganization until after the President's overall approach has been determined.

Very briefly, the statutes establish the Assistant Secretary as the "principal officer in the Department to whom the Secretary shall assign responsibility for the direction and supervision of the Education Division" (Sec. 402(b)). They also assert that the Commissioner of Education "...shall be subject to the direction and supervision of the Secretary," even though the Office of Education is one agency within the Education Division. Over the years a very unwieldy and haphazard organization of the Office of Education had evolved, hindering efficient management of education programs. As the new Administration took office, 28 people representing 26 staff offices reported directly to the Commissioner, and the Commissioner had only one Executive Deputy to supervise all of OE's bureaus, numbering some 120 separate programs and associated support activities.

In dealing with the blurred divisions of responsibilities between the Assistant Secretary and the Commissioner of Education, the Secretary made it clear that he expects OE and NIE to be accountable for the implementation and operation of programs falling under their jurisdictions, and he assigned the Assistant Secretary for Education the following specific functions: policy development, general coordination of the Education Division, interagency coordination, policy communication, and civil rights coordination. In addition to taking management steps to carry out these functions, Assistant Secretary Berry has established the position of Deputy Assistant Secretary for Education (Management and Budget), and established her own personnel office. The Secretary has requested authority which would expand and revitalize the Federal Interagency Committee on Education. I will expand on this last point shortly.

Commissioner Boyer reduced the number of staff units reporting to him from 26 to seven; and established two senior deputies, one for programs and one for administrative and support services. He also has established a task force approach within OE for focusing on top priority issues that do not fall naturally within particular bureaus.

Since the report was submitted, Secretary Califano has announced the reorganization of the regional offices, a move which affects the Education Division. I will address this in more detail shortly.

As the June 30 report suggested, these changes have produced a satisfactory working arrangement, and we recommend no further changes until the President's recommendations are formulated and submitted to Congress.

REORGANIZATION OF THE NATIONAL CENTER FOR EDUCATION STATISTICS

The Education Amendments of 1974 established the National Center for Education Statistics as an independent agency reporting to the Assistant Secretary for Education. The amendment expanded the Center's mission to include four principal mandates by specifying that NCES shall:

"(1) collect, and from time to time, report full and complete statistics on the condition of education in the United States;

(2) conduct and publish reports on specialized analyses of the meaning and significance of such statistics;

(3) assist State and local educational agencies in improving and automating their statistical and data-collection activities;

(4) review and report on educational activities in foreign countries."

Current NCES program activities which specifically address each mandate are:

1. Data Collection and Reporting
   - Common Core of Data (CCD I)

     A census of local school systems, intermediate educational agencies, and State education agencies is being planned for initial implementation during the school year 1977-78. This project, designed to ultimately replace the present elementary-secondary general information system (ELSEGIS), will provide information from the universe of school districts on race, enrollments, staff, finances, and facilities of all public and nonpublic schools. Development of the data base design has almost been completed. A parallel effort in the area of postsecondary education has also been initiated.

- The Fast Response Survey System

  The Fast Response Survey System (FRSS), operational in 1976, is capable of collecting and disseminating data rapidly. Designed to produce nationally representative data within approximately 3 months, FRSS focuses on key, current policy-related issues for which data are not available elsewhere. Three surveys were conducted with FRSS. These include: statewide developments in performance-based education; job-placement services provided by school districts to high school students, graduates, and dropouts, and use of part-time financial aid counselors in institutions of higher education. The findings have been published.

- Condition of Education

  This statistical report describes the condition of education in the United States as required by Title V, section 501(a) of P.L. 93-380. Three reports have been prepared under that mandate.

2. Analysis Activities

Analytical studies enhance the usefulness of information in several ways. They enable change to be assessed more accurately, provide insights into the significance of data through the application of statistical techniques, and describe more fully the education enterprise and its impact on participants by incorporating demographic, social, and economic data.

NCES plans include considerable expansion of the analysis function (a major consideration in the reorganization of NCES). Budget for this function has gone from zero dollars in FY 75 to $1.9 million in FY 78. Linkages between analysis and the data bases for elementary-secondary and postsecondary education were built into the organization at every level. Analysis studies currently focus on:

Methodological Developments
Educational Target Groups
Trends in Education

. Administrator's Fellows Program

A program to promote interest in analysis among NCES staff and provide analysis of NCES data was initiated in 1976. Staff members interested in conducting studies on specific topics compete for a limited number of positions as Administrator's Fellows. Successful competitors are required to complete the analytic work within a 3-month period.

3. Assistance to State and Local Education Agencies

. State-level Personnel Exchange

Through a State-level information and personnel exchange, NCES encourages exchange of technical tools and expertise. A CEIS survey conducted under the information exchange identified and made available to the States various developments in statistical and automated information systems. The personnel exchange sponsors on-site assistance and workshop activities that focus on developments identified in the information exchange.

An annual seminar program for State personnel on improving data production and data utilization selects topics by analyzing the data reported in the information exchange survey.

- State Capacity Building

  NCES is initiating a program to accelerate the development of compatible State statistical systems and to help State and local education agencies to improve these systems. The program will concentrate on upgrading these systems through (a) installation of automated systems in the areas of finance, personnel, pupils, facilities, and curriculum, and (b) improvement of SEA administration and management of data systems through such activities as development of State plans for systems automation and improvement, installation of periodic evaluations of the systems, and implementation of NCES handbooks of standard terminology.

4. International Education Statistics

- Measures of Educational Outcomes in Industrial Nations

  The study is designed to research and compile data on educational outcomes in relation to youth employment in selected industrial nations. It will identify and compare outcome measurements related to the interface between education and youth employment (jobs, income, the transition from school to work, and career ladders), and youth unemployment.

Due to budgetary constraints NCES could only undertake one study in the area of international statistics.

In addition, in response to the Education Amendments of 1974, NCES has organized a consortium of Federal agencies for the purpose of establishing a shared data base for educational statistics. Members of the consortium will contribute their computer tapes and documentation to a central pool and make recommendations for developing the shared data base.

During fiscal year 1976, the NCES program was redesigned and reorganized effective January 17, 1977. The new program design includes the development and maintenance of a core of education statistics for monitoring trends in education that will provide information needed to address policy issues. This requires descriptive data on educational institutions, on individuals participating or not participating in these institutions, and on the impact of educational experience on individuals. It additionally encompasses the full range of statistical services to users that will ensure the utility and use of education statistics. It emphasizes assistance to States and institutions to improve their statistical systems and increase data comparability and use across States; analysis which clarifies the meaning and significance of statistics on the condition of education and dissemination of timely, useful information to the public.

In 1976, an amendment (Sec. 406(g)) to Part A of the General Education Provisions Act gave the Administrator of NCES the responsibility for coordinating "the collection of information and data acquisition activities of the Education Division and the Offiqe for Civil Rights," so as to eliminate excessive detail and unnecessary or redundant information requests.

In the Fall of 1975 the Assistant Secretary for Education established the Education Data Acquisition Council (EDAC), with responsibility to establish criteria for review and coordination of Education Division data acquisition activities. New procedures incorporating the provisions of Subsection 406(g) have been approved by the Assistant Secretary and are before the Secretary for his approval. Representatives from the Office for Civil Rights (OCR) and the Office of the Assistant Secretary for Planning and Evaluation (ASPE) will now serve on EDAC, and OCR will submit its survey instruments to NCES for review by the Council. We believe that EDAC is already working very well and that there will be no difficulty in expanding its role to cover all of the education data acquisition activities.

In addition, as required by other parts of SEc. 406(g), NCES is now publishing for comment a description of each proposed data acquisition activity, revising its handbooks of standard terminology for data collection, and developing guidelines to have summaries of data prepared.

SECRETARY CALIFANO'S PLANS TO RESHAPE THE REGIONAL OFFICES

On July 19 Secretary Califano announced a reorganization of the Regional Offices of HEW. This reorganization clarifies that the five heads of the principal operating components of HEW are accountable to the Secretary for the execution of their programs across the country. The principal regional officials (formerly Regional Directors) now represent the Secretary and perform only those tasks for which his office must be directly responsible in the field. They do not direct any of the programs.

The elements of this reorganization that most directly affect education are the re-designation of the Regional Commissioners as Regional Commissioners of Education Programs, and the appointment in each region of an Administrator for Student Financial Assistance. The Commissioner of Education Programs will provide information and technical assistance concerning all the activities and the programs in the Education Division, including the National Institute of Education, the Fund for the Improvement of Postsecondary Education, the National Center for Education Statistics, the Institute for Museum Services, and the Bureaus in the Office of Education. We are certain these changes will strengthen and clarify the role of the regional offices.

PLANS TO REVITALIZE THE FEDERAL INTERAGENCY COMMITTEE ON EDUCATION

The Federal Interagency Committee on Education (FICE) was first established by President Johnson in 1964, and has since operated under a succession of Presidential Executive Orders. While FICE has enjoyed modest success over the years, it has never been a major policy force.

Among the various beneficiaries of Federal support in education, there is a long-standing sense that Federal policy in the educational sphere is established piecemeal by the many individual agencies and Congressional Committees responsible for these activities. Under the President's reorganization authority, there is an examination of many ways in which Federal education and research activities might be realigned and consolidated to enhance coherence and efficiency. The Secretary has recommended that these deliberations be complemented by upgrading and rejuvenating FICE to improve administrative and broad policy coordination in education until such time as there is a major realignment of education activities in the Federal government.

Accordingly, Secretary Califano has submitted to the President a proposed revised Executive Order which would operationally upgrade FICE, by:

1. Stating explicitly that the Committee may be called upon by the President in the development and coordination of Federal education policy;
2. Naming the Secretary of HEW as Chairperson, instead of the Assistant Secretary for Education; the Assistant Secretary would serve as Vice Chairman;
3. Adding the Science Advisor to the President, and representatives of the Office of Management and Budget, the National Institutes of Health, the Veterans Administration, the Energy Research and Development Administration as members.
4. Stipulating that participating agencies should be represented by policy-level officers.

FICE is already working on an important agenda of problems, and we believe that if it is upgraded, it can do much more.

Thank you, Mr. Chairman.

Dr. RELIC. I would like to acknowledge—even though Mr. Mottl left a few minutes ago—when I appeared before your subcommittee a few weeks ago Mr. Mottl read into the record my welcome to this city and to HEW and said some very nice things about me in the past and I would like to acknowledge it by noting that on the same day he was the losing pitcher in the annual congressional ballgame, Catfish Hunter was also the losing pitcher for the Yankees and I mention that only because years ago the Yankees, just as they could have had Catfish Hunter through the years, also could have had Mr. Mottl when he was in high school and college, and I do note they were the losing pitchers on the same day.

If the Yankees don't win the pennant this year, probably Mr. Mottl will again be coveted by that organization.

I have been asked to comment and I will attempt to keep my remarks very brief on four matters.

One, the general reorganization of the Education Division and the reports submitted to congress by Secretary Califano on June 30 to the effect of the reorganization.

Second, the reorganizational efforts within the National Center of Educational Statistics consistent with the education amendments of 1974 and 1976.

Third, a description of the Secretary's plans to reshape the HEW regional offices. Finally, a description of any plans we have to reactivate the Federal Interagency Council on Education.

Concerning the reorganization of the Education Division, we hope that what is being done is consistent with reorganizational efforts in all areas of HEW, that what we are doing in the Office of Education and what we are doing in the Education Division and what we are doing in the HEW regional offices are all consistent.

I think we found several months ago that the education community was saying there is insufficient communication between the Federal Government and the local and State education governments, and also probably there was insufficient communication within the Education Division itself among its various components. We found also the education community was saying we do not understand if there is coordinated policy development within the Education Division related to communication and that programs necessarily follow logically from this coordinated policy.

We found also many complaints about the efficiency of the Education Division. We also found people saying we were not necessarily responsible and responsive to the highest priority educational needs at the local, district, and State level. We found also complaints that our research in the Education Division did not logically lead to more effective planning, to program development and implementation and to research, both basic research and program research.

We have, therefore, attempted to address all of these concerns by the education community with the reorganization of the Office of Education, Education Division and HEW regional centers, particularly in the area of education.

Very briefly, the statute involving the Assistant Secretary of Education states that the principal officer in the Department to whom the Secretary shall assign responsibility for the direction and supervision of the Education Division shall be the Assistant Secretary for Education.

Therefore all attempts in the past several months to reorganize the division has centered upon this effort.

It should be pointed out, however, that any subsequent effort to coordinate activities in the Education Division should await the action of the President's Reorganization Committee.

The President's effort to carry out a governmentwide reorganizational project therefore we believe makes it unwise at this time to recommend any further reorganization. We will wait the President's overall approach; we will wait until that has been determined before effecting any further reorganization in the division.

In dealing with the division of responsibility between the Assistant Secretary and the Commissioner of Education, the Secretary made it clear in his June 30 report that he expects the Office of Education and NIE to be accountable for the implementation and operation of programs falling under their jurisdiction and he assigned the Assistant Secretary of Education the following specific functions.

Policy development; general coordination of the Education Division; interagency coordination; policy communication; civil rights coordination. In addition to taking management steps to carry out these functions, Assistant Secretrary Berry has established the position of Deputy Assistant Secretary for Eduation in the area of management and budget and has established her own personnel office. In addition, the Secretary has requested authority which would expand and revitalize the Federal Interagency Committee on Education, and I will refer to that in a few minutes.

If the efforts to coordinate activities in the Education Division are not responsive to those points I made initially—that is policy development, more effective communication, better efficiency, responsiveness to the priority needs among the education community and a more logical cycle of research through evaluation—then in fact what we are doing for education is not worth very much.

Only if we respond better to the educational community at the local levels will the reorganization and better coordination and communication at the Federal level have any impact at all. Commissioner Boyer has already indicated specifically those areas of reorganization which he has undertaken within the Office of Education.

A second question refers to the National Center for Education's Statistics. If I understand properly the concern of this subcommittee, it is the concern nationally of educators which say NCES simply has to give data more important to policymaking, decisionmaking. NCES must provide information more quickly; there has to be a better turnaround time; NCES cannot put a greater paperwork burden on us, and therefore many of the questions of the field have been with reference to NCES. Is what is being required and produced by NCES more timely, more helpful? Does it contribute better to the decisionmaking process at the local and State levels and is it too much of a burden to require the data?

I think you will find—and I think this can be corroborated by testimony from the local and State level—that the answers gradually, perhaps grudgingly in some areas, are essentially yes, what is being produced, especially in the last couple of years, and will be determined in the next several years to make the burden less, but the responsiveness more, and the utility more of the statistics developed through NCES.

The mandates specifically of the National Center for Educational Statistics are (1) to collect from time to time and report full and complete statistics of the condition of education in the United States, (2) to conduct and publish reports on specialized analysis of the meaning and significance of such statistics, (3) to assist state and local education agencies in improving and automating their statistical and data collection activities and, (4) to review and report on educational activities in foreign countries.

Mr. BLOUIN. The House goes into session in about 2 minutes and I think a couple of members have some questions. If you could summarize that for us, we will insert the entire text in the record.

Dr. RELIC. The summary would be that we are attempting to do all four of those mandates, especially in the area of quick response to the education community.

Mr. Blouin, do you wish me to go on to the third and fourth questions now or would you prefer to ask questions?

Mr. BLOUIN. If you can summarize it briefly, you might as well finish it up.

Dr. RELIC. The HEW regional reorganization centers primarily on assigning a function of coordination to the Regional Director. The position of Commissioner of Education at the regional level has been abolished and that person now has a direct program function. The essence of the reorganization there is to effect much better communication and coordination between the Federal level and the regions and to make the regions more responsive to the needs of the education community, including technical assistance and dissemination.

The Federal Interagency Committee on Education has continued to operate since instituted in 1964. This has been authorized and revised periodically. The primary effort now will be to develop a comprehensive education policy throughout the Government with that organization, with the acronym of FICE, as the central agency to coordinte these activities.

Probably the most important thing going on currently is the attempt to develop a policy on education and energy and placing an energy action center in the Office of Education.

Secretary Califano has also suggested that the Secretary of HEW be designated as the chairperson rather than the Assistant Secretary of Education who would henceforth act as a vice chairperson for FICE.

We are, of course, still awaiting the President's reaction in the revised reauthorization. Thank you very much.

Mr. BLOUIN. We appreciate your willingness to summarize that for us. We have a rather rigid schedule on the floor and I know we are going to get into a vote almost immediately.

Let me ask Commissioner Boyer a couple of questions on behalf of the chairman.

First, if we understand your testimony correctly, you seem to agree that on the face of it at least the distribution of personnel among programs at OE seems to be rather haphazard. It seems major programs such as Title I are not receiving adequate allocation of personnel to administer them. For instance, in the table you included in your testimony, Title I has only 7.3 percent of the positions within the office, although it has 36.8 percent of the appropriation for elementary/secondary.

Could you tell us what the criteria have been in the past for the assignment of personnel among various programs within OE?

Could you also tell us what criteria you propose to use to assign personnel? I am especially concerned with knowing these criteria since your new personnel report does not specifically ask the assignment of additional personnel to title I, but it does specifically ask for the assignment of additional personnel to the relatively minor programs that are in the Special Projects Act.

[Tables submitted by Ernest Boyer follow:]

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NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

	Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
			Number	Percent [1/] of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
1.	Programs for migratory children (OMB 13.429)	Elementary and Secondary Education Act, Title I, Sec. 122	15	1.8	1.8	131	2.8	2.8
2.	Programs for disadvantaged children (OMB 13.428)	Elementary and Secondary Education Act, Title I	61	7.3	9.1	1,721	36.8	39.6
3.	Vocational education - basic programs (OMB 13.493; 13.494; 13.495; 13.499; 13.501; 13.558)	Vocational Education Act of 1963, Parts B, F, G, H, J, and Sec. 102(b) and 104	65	7.8	16.9	535	11.4	51.0
4.	School maintenance and operation (OMB 13.478)	School Assistance in Federally Affected Areas (PL 81-874)	91 [2/]	10.9	27.8	768	16.4	67.4
5.	Indian Education (OMB 13.534; 13.551)	Indian Education Act (PL 92-318)	21	2.5	30.3	25	.5	67.9

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* Allocation as of 5/1/77

[1/] This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

[2/] This figure includes a ceiling allocation of 36 positions located in ten regions. These staff are assigned to the SAFA program - both maintenance and operation and construction-and are not allocated separately.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY

EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

Type of Assistance	Authorizing Legislation	Positions Allocated Number	Positions Allocated Percent 1/ of total	Positions Allocated Cumulative percent	Appropriation Dollars (millions)	Appropriation Percent of total	Appropriation Cumulative percent
6. Desegregation assistance (OMB 13.525; 13.526; 13.528; 13.529; 13.530; 13.531; 13.532; 13.405)	Emergency School Aid Act, Title VII (PL 92-318) and Civil Rights Act of 1964, Title IV	153	18.4	48.7	275	5.9	73.8
7. Supplementary educational centers and services, guidance counseling, and testing for the handicapped (OMB 13.519)	Elementary and Secondary Education Act, Title IV-C	Included in 13.571, Educational innovation and support			20	.4	74.2
8. Education for the handicapped (OMB 13.444; 13.445; 13.446; 13.450; 13.451; 13.452)	Education of the Handicapped Act, Parts C, D, and F	62	7.4	56.1	111	2.4	76.6
9. Community schools (OMB 13.563)	Education Amendments of 1975, Special Projects Act, Sec. 405	7	.8	56.9	4	.1	76.7
10. Bilingual education technical assistance coordination (OMB 13.403)	Elementary and Secondary Education Act, Title VII	Included in 13.403, Bilingual education			4	.1	76.8

* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated Number	Positions Allocated Percent 1/ of total	Positions Allocated Cumulative percent	Appropriation Dollars (millions)	Appropriation Percent of total	Appropriation Cumulative percent
11. Bilingual education (OMB 13.403)	Elementary and Secondary Education Act, Title VII	60	7.2	64.1	98	2.1	78.9
12. Women's educational equity (OMB 13.565)	Education Amendments of 1974, Special Projects Act, Sec. 408	7	.8	64.9	7	.2	79.1
13. Career education (OMB 13.554)	Education Amendments of 1974, Special Projects Act, Sec. 406	20	2.3	67.2	10	.2	79.3
14. Ethnic Heritage Studies (OMB 13.549)	Elementary and Secondary Education Act, Title IX	5	.6	67.8	2	-	79.3
15. Gifted and talented children (OMB 13.562)	Education Amendments of 1974, Special Projects Act, Sec. 404	6	.7	68.5	3	.1	79.4

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* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
		Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
16. Adult education (OMB 13.400)	Adult Education Act	33	3.9	72.4	81	1.7	81.1
17. Follow Through (OMB 13.433)	Community Services Act (PL 93-644) Title V	26	3.1	75.5	59	1.3	82.4
18. Indian education (OMB 13.536)	Indian Education Act (PL 92-318) Title IV, Part C (Sec. 314 Adult Education Act)	3	.4	75.9	4	.1	82.5
19. Educational innovation and support (OMB 13.571)	Elementary and Secondary Education Act, Title IV-C	36	4.3	80.2	185	4.0	86.5
20. Programs for the handicapped-aid to states (OMB 13.449)	Education of the Handicapped Act, Part B, as amended by PL 94-142	45	5.4	85.6	200	4.3	90.8
21. Teacher Corps (OMB 13.489)	Higher Education Act, Title V	39	4.7	90.3	38	.8	91.6

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* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
		Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
22. Programs for children in state institutions for the neglected and delinquent (OMB 13.431)	Elementary and Secondary Education Act, Title I, Sec. 123	7	.8	91.1	29	.6	92.2
23. Library and learning resources (OMB 13.570)	Elementary and Secondary Education Act, Title IV B	11	1.3	92.4	147	3.1	95.3
24. Right to Read (OMB 13.533)	Education Amendments of 1974, National Reading Program, Title VII (PL 93-380 as amended by PL 94-194)	26	3.1	95.5	26	.6	95.9
25. Indian education (OMB 13.535)	Indian Education Act (PL 92-318) Title IV, Part B	8	1.0	96.5	13	.3	96.2
26. Programs for the handicapped in state-supported schools (OMB 13.427)	Elementary and Secondary Education Act, Title I, Sec. 121	Included in 13.449, Programs for the handicapped - aid to states			111	2.4	98.6

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* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

NUMBER OF OE CEILING POSITIONS ALLOCATED* TO SELECTED ELEMENTARY AND SECONDARY

EDUCATION PROGRAMS AND THE FISCAL YEAR 1977 (REGULAR) APPROPRIATIONS FOR THESE ELEMENTARY AND SECONDARY EDUCATION PROGRAMS

(Continued)

Type of Assistance	Authorizing Legislation	Positions Allocated			Appropriation		
		Number	Percent 1/ of total	Cumulative percent	Dollars (millions)	Percent of total	Cumulative percent
27. Incentive grants (OMB 13.512)	Elementary and Secondary Education Act, Title I, Part B	Included in 13.428, Programs for disadvantaged children			25	.5	99.1
28. State administration of ESEA, Title I programs (OMB 13.430)	Elementary and Secondary Education Act, Title I	1	.1	96.6	21	.5	99.6
29. State equalization grants (OMB 13.572)	Education Amendments of 1974, Title VIII, Part D, Sec. 842	7	.8	97.4	11	.2	99.8
30. Packaging and dissemination (OMB 13.553)	Education Amendments of 1974, Sec. 402, Special Projects Act and the General Education Provisions Act, Sec. 422(a)	13	1.6	99.0	10	.2	100.0
31. Metric education (OMB 13.561)	Education Amendments of 1974, Special Projects Act, Sec. 403	6	.7	99.7	2	-	100.0
	TOTAL	834	100		4,676		

* Allocation as of 5/1/77

1/ This is the percent of the total OE staff allocations for the 31 programs listed herein. Accordingly, it is comparative to the Appropriations Table given in the last three columns.

Mr. Boyer. I must candidly convey the fact that I do not know criteria of the past, Congressman, and I don't have that and I wouldn't speculate. The criteria for the future will relate directly to the nature and the magnitude of the task. We must have a clear understanding that there is a difference between the flowthrough dollars and the total management. Let me draw an analogy. There is a great difference between what you might call a craft industry and a more efficient assembly-line production. As I tried to say in my testimony, some of the small, discretionary grants for which we are wholly responsible are under what I would call the craft industry model, where even small amounts of money must be managed by what seems to be disproportionately large numbers of people. But to answer your general question, I am testing it in at least 2 ways.

One: is it a matter of discretionary dollars or of flowthrough? Two: how many people do we need in order for that job to be achieved directly?

I can't give you any formula beyond that, except good management to see that it is achieved.

I might add, Mr. Chairman, that the moneys for the positions we have gotten recently have been specifically targeted for fraud and abuse and have almost exclusively been assigned to the Bureau of Student Financial Assistance where we have a lot of catching-up to do just in the monitoring.

Here is an example where the task we are involved in requires that we ourselves follow through in collections since there is not an institution beyond us upon which we can depend. That is another interesting factor of OE management.

In many of the programs we are the intermediary between Congress and a delivery institution. In other instances, we administer entirely and there is no administering institution upon which we can rely for follow-up. In the case of the loans that involve the student and a bank, we have to carry right on through. We don't have a state education department; we don't have a college or university that we can use as a part of the follow-up administration. There is a complexity in analysis of the nature of the job when you are saying how many staff you need to carry it out.

Mr. Blouin. You mentioned that to administer a program requires a core staff per program.

Mr. Boyer. Yes.

Mr. Blouin. Is it fair to say that perhaps we have too many separate programs?

Mr. Boyer. Yes, indeed. From a management and administrative view, it is absolutely true.

If you run a college most people think you need a president, a dean, a librarian, a staff to make it go, whether you have 200 students or 2,000. That is the economy of scale.

Now, that may not be your only criterion. You may say that this is so important we want to illustrate this as a priority so we are going to put it on a separate line. The administration therefore will suffer, but you just have to know that administratively economy of scale is a factor and you have to then trade something else off. The truth is, I think we have a number of programs that precisely illustrate that.

Now, if we believe the substance of those programs to be important, then you pay the price for less effective management.

Mr. **Blouin**. Is it fair to say that the sheer numbers of programs drain the ability administratively to add to the—like the Title I program——

Mr. **Boyer**. If in the process we do not expand our staff or if there are job freezes imposed on us, then you clearly are trading off dispersion for more investment in the larger programs.

Now, please, I want to stress this is not intended as a defense of the present distribution. I think we need to look at what is highlighted in the analysis which we have given you, but I am giving you some guidelines and the answer would be, certainly you have to tradeoff unless you are able to expand your staff proportionately.

Every new program that is authorized clearly then will commit staff, and very often in starting up new programs we actually borrow from staff in other bureaus in order to get a new program started because we aren't given additional start-up staff to get on with that.

Mr. **Blouin**. It is my understanding that non-public school officials in several States, upon more than one occasion, have notified OE that a certain State or LEA agency have not complied with requirements of the ESEA for participation of non-public school children and teachers. I think examples can be found in Missouri, Wisconsin, Virginia, and Oklahoma.

Some of those situations have been resolved. Oklahoma is no longer a problem. I am told in all instances OE has taken an inordinate amount of time to either respond to those complaints or to initiate collective action. For example, some of these situations have been unresolved for over 18 months. Are you aware of these situations?

Mr. **Boyer**. Yes, I am, and I think it is partially a function of the staff limits, Congressman, but also I just spent some time on the issues raised in Virginia last week. I have to say very often it is complicated very much by contradictory legal and State laws that keep blurred the question of what is indeed the legal course of action. Very often it has been a series of back-and-forth encounters with lawyers on the legal issues.

I guess I am saying I think the delays in those vary. That is one of the most delicate and legally subtle areas in which the office is engaged, how to move to private schools, given the Supreme Court's judgments, and also in some instances state judgments that seem contradictory,

So part of the delay, it seems to me, does not flow from the fact that we are slow or disinterested but it is sometimes the imponderables court decisions raise.

Mr. **Blouin**. In the Virginia situation specifically, I have a history of a timetable involved that I would like to submit to you in case it is not accurate, but it started with a request to the Commissioner in January, January 12, 1976, to grant a bypass to Virginia in order for non-public school children to participate in Title I programs, and as of yesterday it is still pending action on the part of the U.S. Commissioner.

After what appears to be nearly 2 dozen contacts or exchanges, it seems to be unresolved. Is that a normal length of time for that kind of problem?

Mr. BOYER. I suspect, to answer your question, it is not as typical as regards the question of bypass. I can tell you I had a meeting with the State Superintendent of Virginia last week as I mentioned. This was the first where I personally intervened. I learned of the delay. We did have a meeting and a subsequent meeting is scheduled with the principals next week. I intend to push toward resolution.

I don't want to prejudge past or apparent delays. I do know after that hour with the State superintendent I was impressed by the enormous complexity and some of the delays were understandable. Even the court actions, Congressman, that occurred in transit, seemed to actually change the ground rules as to the kind of judgment to be made.

You have in this instance two pressures that in some instances seem almost at swords' points. That is to make available—which is our policy—as much as possible, Federal moneys under bypass to help the private schools, but very often very tightly written legislation and even court decisions in a given State seems to counter that, so working out a solution is not easy. I can assure you in the illustration you gave I am involved and I am determined to get resolution.

Mr. BLOUIN. I understand there is a director of non-public school services within OE and I assume that person generally is involved considerably. Does that person have the necessary authority to effectively handle non-public school problems?

Mr. BOYER. Authority is probably not quite the word. Organizationally the director of the non-public schools office is a staff officer to the Commissioner. He does not administer. They are not programs directly administered by that staff person but his role is twofold. He is, first of all, to be available to all of the non-public school people as the immediate and continuing access to the Office of Education and most especially the Commissioner. More than that, he is to bring to my attention all issues relating to the non-public schools and to see to it that administratively those issues are resolved.

I can tell you that that office is a very important one. Just yesterday I had a meeting with several people in relation to that office and it will be not only continued, but strengthened.

Mr. BLOUIN., That was my next question. I wanted to ask you if you planned to beef up that position in your reorganization of the Department.

Mr. BOYER. Yes, in the sense that it belongs to one of the staff offices that I pictured earlier, the education community liaison office to the left of the Commissioner's office. It is getting top priority.

I am bringing together a number of staff people who heretofore have been isolated and in many instances from what I have heard, unrelated to day-to-day Commissioner work. Coordinating that into a single unit, having regular meetings and making sure our agenda of reaching out, including the private schools, is well organized and continuous is my goal, so the answer is, that office will indeed be strengthened.

Mr. BLOUIN. Thank you.

I have a few other questions that I would like to submit for the record and would appreciate your office responding to them.

Mr. BOYER. We will do so.

[The questions referred to follow:]

August 16, 1977

The Honorable Ernest L. Boyer
Commissioner
U. S. Office of Education
Washington, D. C.

Dear Mr. Commissioner:

At the Subcommittee's hearing on August 3rd, you were informed that we would be submitting some additional questions for the record regarding participation of non-public school children in Federal education programs.

I would appreciate you responding to these questions, which are attached to the letter, as soon as possible, in order that we might clarify the general situation with respect to non-public school services. I am also enclosing a copy of a document referred to during the course of the hearing detailing the case history of the situation in Virginia. The Committee would also appreciate any comments or additions you might consider appropriate concerning this case history.

I would like to thank you again for your appearance before the Subcommittee and will look forward to hearing from you.

Sincerely,

Carl D. Perkins
Chairman

CDP/jm

(1) Does the U.S. Office of Education have a specific set of procedures for handling complaints from appropriate nonpublic school officials?

(2) If not, would such procedures improve the ability of USOE to effectively deal with such complaints and problems?

(3) Have USOE program personnel and other appropriate officials been instructed to handle nonpublic school complaints and problems in the same manner in which they would handle these matters if they were raised by public school officials?

(4) Will the Office of Nonpublic Educational Services be identified on the new OE organizational chart?

(5) Will the Director of the Office of Nonpublic Educational Services report directly to the U.S. Commissioner or to an intermediary?

(6) How does USOE consult with the nonpublic school community in determining its policies and procedures for implementing all of these Federal programs?

(7) How does this compare with the manner in which public school officials are consulted by USOE at the local, state, and national levels?

(8) Does the USOE have a specific set of procedures for implementing the nonpublic school by-pass authority in ESEA Titles I and IV B and C?

(9) If such procedures exist, have either the public or nonpublic school sector been informed of them?

(10) If such procedures exist, are they followed with any consistency in dealing with various problems in different parts of the country?

(11) Has there been any consideration of formalizing such procedures through the Federal regulations process? If not, why not?

(12) What are the factors or circumstances that are considered in determining the necessity of utilizing the by-pass procedure?

(13) What information does the Office of Education gather to determine the extent of participation of nonpublic school children in Title I, IV (B) and (C) of the Elementary and Secondary Education Act?

(14) From whom does USOE gather information to determine the participation of nonpublic school children?

(15) What attempts are made to certify the accuracy of information supplied to USOE by either the LEA or the SEA?

(16) Is there a systematic and consistent approach taken by USOE review teams in evaluating programs, in particularly as it relates to the participation of nonpulbic school children?

(17) What corrective actions does USOE take if such information indicates a lack of participation?

HISTORY OF A REQUEST FOR ASSISTANCE FROM THE U.S. OFFICE OF EDUCATION

Nonpublic school children in the State of Virginia have not been provided participation in ESEA Title I programs. All efforts on the part of nonpublic school officials to resolve the situation on the local and state levels were in vain. Nonpublic school officials in the Richmond Diocese request the Commissioner for a by-pass.

On JANUARY 12, 1976, Sr. Lourdes Sheehan, Superintendent of the Diocese of Richmond requests the U.S. Commissioner of Education to grant a by-pass in Virginia in order for nonpublic school children to participate in Title I programs.

FEBRUARY 19, 1976 -- The U.S. Commissioner of Education acknowledges receipt of Sr. Sheehan's letter of 1/12/76. Promises to look into the matter.

APRIL 23, 1976 -- Deputy Commissioner for the Bureau of School Systems writes to Sr. Sheehan requesting specific information within 30 days.

APRIL 23, 1976 -- The Deputy Commissioner for the Bureau of School Systems also informs the Honorable William Campbell, Superintendent of Public Instruction in Virginia, that there is a complaint filed by Sr. Sheehan. The Office of Education requests specific information from the State Education Agency.

MAY 21, 1976 -- Sr. Sheehan responds to the request of the Deputy Commissioner and provides the specific information.

JUNE 22, 1976 -- Mr. William Campbell responds to the April 23 letter from the Deputy Commissioner providing him with the requested data.

AUGUST 9, 1976 -- The Deputy Commissioner for the Bureau of School Systems writes back to Mr. Campbell requesting more precise and accurate data. The data submitted on June 22 was inadequate.

NOVEMBER 17, 1976 -- The Deputy Commissioner again writes to Mr. Campbell reminding him of the August 9 request for further information.

DECEMBER 3, 1976 -- Mr. Campbell acknowledges receipt of Mr. Wheeler's letter of 11/17. States that Section 10 of the Constitution of Virginia greatly limits the services and materials which can be provided to nonpublic school children.

DECEMBER 10, 1976 -- Sr. Lourdes Sheehan writes to the U.S. Commissioner of Education again requesting a by-pass for Title I.

DECEMBER 21, 1976 -- Richard Duffy of the U.S. Catholic Conference writes to the Commissioner of Education to intervene on behalf of Sr. Lourdes Sheehan. U.S. Commissioner of Education does not acknowledge receipt of Duffy's letter until March 23, 1977.

FEBRUARY 14, 1977 -- Acting Commissioner of Education William Pierce acknowledges receipt of Sr. Sheehan's letter of 12/10. Advises Sr. Sheehan that the matter is still under investigation.

MARCH 10, 1977 -- Acting Commissioner of Education William Pierce answers Mr. Campbell's letter of 12/3/76 and asks Mr. Campbell to provide an official statement indicating whether or not the State Education Agency has the authority to provide services to nonpublic school children as required by law.

APRIL 1, 1977 -- Mr. Campbell responds to the March 10 letter of Acting Commissioner Pierce stating that he has no objection to a "by-pass" being granted the Catholic Diocese.

JULY 7, 1977 -- U.S. Commissioner Boyer responds to Mr. Campbell's letter of April 1. States that he will not be able to approve the 1978 Title I Program Plan for the State of Virginia. Requests that Mr. Campbell provide the Office of Education with the information which was requested on April 30, and June 8, of 1976, and March 10, 1977. Is directing the Office of Education to send an investigating team to Virginia

JULY 19, 1977 -- Mr. Campbell responds at length to Commissioner

Boyer's letter. Again states that the Constitution of Virginia is very restrictive. Hopes the Commissioner can resolve the apparent impasse.

AUGUST 2, 1977 -- Awaiting action on the part of the U.S. Commissioner

The above case study in Virginia is not an isolated example of attempts to have the Office of Education respond to requests for assistance from nonpublic school officials. Similar case studies can be documented for the States of Missouri, Oklahoma, and Wisconsin. At this very moment the U.S. Commissioner of Education has never notified the Superintendent of Public Instruction in the State of Wisconsin that she has received a complaint from nonpublic school officials although that complaint was filed on February 13, 1976.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON D.C. 20202

[illegible] 7

Honorable Carl D. Perkins
Chairman, Committee on
Education and Labor
House of Representatives
Washington, D.C.

Dear Mr. Chairman:

Thank you for your letter of August 16 which concerns additional questions subsequent to the August 3 hearing of the Subcommittee regarding the participation of nonpublic school children in Federal education programs. I am enclosing a paper which provides responses to the 17 questions.

You also asked for any additional comments on the Title I situation in Virginia. I am pleased to report significant progress to resolve this matter. Our office has conducted extensive negotiations with the Virginia Chief State School Officer and his staff, and representatives of the State Attorney General's office, as well as nonpublic school representatives and superintendents from the local public education agencies. The State of Virginia has agreed to reserve, and not obligate or expend, $505,000 of Title I funds appropriated for Fiscal Year 1978, which would be used, if necessary, for the implementation of a bypass in these five local education agencies.

On September 26, I officially notified the Virginia State Education Agency and the Alexandria, Newport News, Norfolk, Portsmouth, and Richmond local education agencies of our intention to establish bypass so that equitable Title I services could be provided to eligible nonpublic school children. Additionally, my Title I staff conducted on-site surveys in thirteen other local education agencies in Virginia to assist me in determining whether or not there is significant failure to provide equitable benefits to eligible nonpublic school students. That report is in the process of being prepared.

I hope this information is helpful.

Cordially,

Ernest L. Boyer
U.S. Commissioner
of Education

Enclosure

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

DRAFT FOR DISCUSSION

For Chairman Perkins

1. Does the U.S. Office of Education have a specific set of procedures for handling complaints from appropriate nonpublic school officials?

Complaints from appropriate nonpublic school officials are sent to the responsible operating division for action. We are instituting procedures to expedite the handling of such complaints.

2. If not, would such procedures improve the ability of USOE to effectively deal with such complaints and problems?

Yes, I believe our new procedures will improve our ability to deal with nonpublic school complaints.

3. Have USOE program personnel and other appropriate officials been instructed to handle nonpublic school complaints and problems in the same manner in which they would handle these matters if they were raised by public school officials?

We are conducting policy meetings to make clear to all our decision-making staff that we will handle nonpublic school complaints on the same basis as public school complaints.

4. Will the Office of Nonpublic Educational Services be identified on the new OE organizational chart?

Nonpublic Educational Services will be identified within our new unit, Educational Community Liaison which will be headed by an Assistant Commissioner who will report directly to the Commissioner.

5. Will the Director of the Office of Nonpublic Educational Services report directly to the U.S. Commissioner or to an intermediary?

The director, Nonpublic Educational Services, will report to the head of our Educational Community Liaison. This group will meet with the Commissioner monthly to review the concerns of nonpublic and public education constituencies. We believe the new, stronger organization will result in increased total resources available for liaison and even better services for nonpublic constituencies.

6. How does USOE consult with the nonpublic school community in determining its policies and procedures for implementing all of these Federal programs?

USOE consults regularly with the nonpublic school community in its policy and procedures development through direct contacts with the American Council for Private Education, The U.S. Catholic Conference, the National Catholic Education Association and the National Association of Independent Schools. All sectors of the nonpublic school community may, and frequently do, respond to regulation notices that are submitted for public comment. Additionally, we are conducting a nonpublic school education week in November to further improve our communications and working relations with our nonpublic educational colleagues.

7. How does this compare with the manner in which public school officials are consulted by USOE at the local, state, and national levels?

We believe, however, that our communications with the nonpublic education community will be improved with the Education Community Liaison Unit and that our consultations with the nonpublic school community should be at an effective level. We have had more contact with the public school community because of the laws governing education and the numbers involved.

8. Does the USOE have a specific set of procedures for implementing the nonpublic school by-pass authority in ESEA Titles I and IV B and C?

The by-pass authority in Title I became law in 1974, as it did in Title IV. There have been quite different legal questions to resolve in terms of Federal and State laws. We are now defining our by-pass procedures more precisely to bring about a speedy resolution to complaints that have by-pass potential.

9. If such procedures exist, have either the public or nonpublic school sector been informed of them?

Generally, there has not been widespread dissemination of such information because in most States the procedures have not been necessary. We will carefully consider how best to inform both the public and nonpublic school system about our new procedures for handling complaints that have the potential for by-pass.

10. If such procedures exist, are they followed with any consistency in dealing with various problems in different parts of the country?

We have been reasonably consistent, but it has been necessary to treat each complaint as a separate case since we have found varying differences in the cause for possible inequitability of services to nonpublic school children.

One State may provide such services only after public school hours; another State may offer dual enrollment without providing transportation. We have enough experience now, however, to know the general range of legal questions that must be answered.

11. Has there been any consideration of formalizing such procedures through the Federal regulations process. If not, why not?

We plan to formalize the procedures for internal use but we hesitate to add to the regulations process. How we execute by-pass is a management problem and we are formulating a system for better OE performance. We believe this is preferable to writing more regulations for the Federal Register. Our experience to date indicates a need for individualized treatment of each situation.

12. What are the factors or circumstances that are considered in determining the necessity of utilizing the by-pass procedure?

Our first attempt is to have the nonpublic school officials and the SEA or LEA negotiate the matter. For example, we were successful in Oklahoma in resolving a complaint by suggesting the use of mobile units. There have been other successful resolutions through negotiations. Where negotiations fail, the major factor in determining the necessity of by-pass is through an on-site investigation conducted by USOE to determine the facts of the case.

13. What information does the Office of Education gather to determine the extent of participation of nonpublic school children in Title I, IV (B) and (C) of the Elementary and Secondary Education Act?

We do not have a reporting requirement for nonpublic school participation but State plans for these programs estimate the public and nonpublic school participation. Our monitoring teams also obtain enrollment information at specific locations.

14. From whom does USOE gather information to determine the participation of nonpublic school children?

Generally any data we receive is from the SEA. However, where there are complaints, or where our monitoring visits reveal a deficiency leading to an official investigation for facts, we obtain our information on nonpublic school students participation from both the public and nonpublic educational agencies.

15. What attempts are made to certify the accuracy of information supplied to USOE by either the LEA or the SEA?

Facts provided in State plans are reviewed in the approval process. OE review teams monitor the LEA application information and data for accuracy. Facts concerning nonpublic school student participation are also reviewed with nonpublic school representatives.

16. Is there a systematic and consistent approach taken by USOE review teams in evaluating programs for nonpublic school children?

Our approach is to utilize review teams to monitor LEA programs for nonpublic school participation. This is done in terms of numbers of eligible students, the needs of the students, and the kind and quality of services and nonpublic school student access to Federal education programs.

17. What corrective actions does USOE take if such information indicates a lack of participation?

In most cases, the appropriate division takes corrective action through follow up with the SEA staff. However, in some more difficult situations, there are legal complexities that require the Deputy Commissioner or the Commissioner, to call the matter to the attention of the SEA. Where there is a finding of significant failure to serve the nonpublic school children equitably, USOE enters into negotiations to find a resolution to the matter. Where the legislation authorizes by-pass, this administrative procedure is used when negotiations fail to remedy the problem.

Mr. **Buchanan**. I understand the Assistant Commissioner is in charge of that new group which will report directly to you.

Mr. **Boyer**. That is right, but I should stress that we, based on an experiment we ran last week, actually meet as a staff. He acts as a coordinator and builds the agenda and stays in continuing touch with each of the separate liaison offices, but then I meet with the group to plan calendar, to identify where we are having problems and not in any way to build a barrier with those offices.

Mr. **Buchanan**. In connection with the problem of multiplicity of programs, the small budgets and the administrative structure required to sustain them, I am going to read a part of Public Law 93-380 and ask you if this is a part of the problem. I have picked a program I personally consider important and that is career education. We say in the law, "The office shall be headed by a director and report directly to the Commissioner," et cetera.

Do you foresee the possibility of a request in time from you or from the Department for some legislative action to revise some of the things we have mandated in terms of structure?

Mr. **Boyer**. Yes, I would like to test the water. I think some of these programs do so much relate in purpose to other programs that are carried on in other bureaus or other units that we somehow fragment what could be a much more powerful educational message and impact if we could find a way to get it together without in any way suggesting to people that priorities have been diminished. Somehow there is a belief that if a program has its own director and reports directly to the Commissioner that it is really the most important thing in Washington, when in fact that isolation, that fragmentation, may cause it to have less educational impact later on.

What I guess I suggest, without picking on any single example, is that if we could pull four or five related programs together operationally, whole would be greater than the sum of the parts, because you get a multiplying effect.

I understand the history of some of this and I understand too there was a great fear on the part of Congress that some of these worthy programs might not be administered, or the mandate might not be carried out, so I am not looking behind me, but looking ahead.

I do think we should talk together, if the committee would be willing, with staff, to see whether some clustering might occur. Functionally, as I said, I have been trying to achieve this by creating some teams within the office where the people within the various offices come together, compare their agenda, compare their findings, maybe develop some common schedules for the awarding of grants.

I think we do have some improvement to make here if our goal is effective administration of these crucial programs.

Mr. Buchanan. Thank you.

Yesterday we had a hearing on the Buckley amendment. What are HEW's recommendations regarding the Buckley amendment?

Mr. Boyer. I think that is in the department where it is administered.

I asked Al a question just as you were asking me a question, so we are both totally unprepared to respond.

Mr. Buchanan. What is the department's reaction to the privacy commission recommendation on the Buckley amendment?

Dr. Relic. I believe those were given to you yesterday. We do not administer the Buckley amendment. It is administered in the Department. It is not in the Education Division, as a matter of fact.

I do not have that information, Mr. Chairman. Mr. McFee is responding for the department. I believe he testified yesterday.

Mr. Buchanan. There was no response from HEW on the recommendations as far as I can recall and we would like to have them for the record if possible.

Mr. Boyer. We will do that. I am sorry.

Mr. Buchanan. Also inform us if the Buckley amendment was sent to the Office of Education where it would be administratively located, or if it was transferred to the Assistant Secretary of Education.

Mr. Boyer. We will provide that.

Mr. Buchanan. Why hasn't the compilation of federally assisted innovative projects, required in section 424 of the General Education Provisions Act, been submitted?

Dr. Relic. We have not effectively done that.

In the past no concerted effort has been made within the Education Division to gather this information from areas such as Title IV(c) and special projects, NIE, and The Funds for the Improvement of Postsecondary Education. No concerted effort has been made to do that. That process, however, is now well under way, which means a sigle compilation of all innovative projects throughout the entire division.

Mr. Buchanan. I will read one paragraph from the July 28th letter I have before me from Assistant Secretary Berry. This letter is not to me.I will read one paragraph:

"My staff is presently re-examining the question of whether and in what fashion a report might be produced and we will let you know if we decide to produce a report."

I just want to point out that it is required by law that the report be produced.

Dr. RELIC. We agree. The report will be produced.

Mr. BUCHANAN. Under Civil Service and OE personnel procedures, how long on the average does it take to fill the typical supergrade vacancy?

Mr. BOYER. I was going to make an estimate of 4 to 6 months, based upon my early experience, and I think it has gone much beyond that, Mr. Buchanan.

Mr. BUCHANAN. In the past?

Mr. BOYER. Yes.

Mr. BUCHANAN. Do you know whether a major change might be made to shorten that period? Is that not one of the problems within the Office of Education in the Department, the length of time required to fill such a position?

Mr. BOYER. It is a problem , yes, indeed. On the other hand, I suppose in rank order it is not an overriding one. We don't have many supergrade positions to fill and very often people find a number of things like consultancies and so forth available, but it slows down the efficiency with which one can move in and provide strong leadership in key areas. That is certainly true.

[Recess taken.]

Chairman PERKINS. Dr. Boyer, I am glad you are here today and are going to address yourself broadly to these issues because the bill we are going to write early next year will affect $5 billion of the $10 billion of programs your office administers so we have a good opportunity to correct many of these problems.

If I undestand correctly, Mr. Commissioner, in your testimony, you seem to agree that we must make every effort possible to cut back on excessive paperwork. However, you do not comment on the data supplied to you before the hearing showing what seems to be an inordinate amount of paperwork being demanded in the administration of some relatively minor programs such as the community school program. Can you comment on that and especially why the community school program generates 4.9 percent of the paperwork in the education field while it has one-tenth of one percent of the appropriation for elementary and secondary schools.

Mr. BOYER. I do not have the details to explain that peculiar percentage. The initial inquiries I have made, Mr. Chairman, suggest they do engage themselves with the community. It is a program that by definition involves more constituencies, bringing in people in the area. They have to reach out from the school and I think they are in the process of doing this. They have used community surveys to try to find what the needs and wishes of the community are, what areas they need for special services and it is a program where the constituencies that help guide it, the opinions from those beyond the school matter in determining the nature of the community school activity. As a consequence, I think there is something inherent in the program that might have them engaging in more surveys and sampling and paperwork, to use our label here, than might be true of some others.

I would repeat as a general principle that I think overall we have overdone the use of paper in this and in many of the programs, both in frequency and in magnitude, and occasionally we have depended on surveys where some commonsense judgments or more informal encounters might allow us to proceed.

I can assure you that that example, along with others, will be carefully scrutinized, and that we will make sure as much as humanly possible, that we are not inflating the paper demands in those programs where modest investments in resources have been made.

Chairman PERKINS. I would consider this hearing a success if I understand that we have your assurance that when you come back before the committee in the fall with your legislative proposals on elementary and secondary education, you will describe for us not only, one, how you want to change the legislation on its face, but also, two, what personnel changes you are going to make in the Office of Education in the light of this legislation and, three, what effect the legislation will have on relieving paperwork problems at the State and local levels. In other words, I believe we must not only look at the changes in this legislation, but we must also look at how those changes will be administered by the Office of Education and what effects they will have on the State and local levels.

Do I understand correctly that we have your commitment you will endeavor to give us this complete picture when you return in the fall?

Mr. BOYER. Yes, you do, and I would add that I consider that, Mr. Chairman, to be my obligation. I am here to administer these programs. Effective administration is the assignment I have been given, so I think it is my responsibility to display for you the alternatives that will permit these dollars to achieve their objectives educationally as efficiently as possible so the pledges——

Chairman PERKINS. Let me make it perfectly clear that I think the Congress has been perhaps more derelict than the Office of Education because we have been enacting legislation and specifying certain requirements without due consideration as to the amount of paperwork required. Of course, some of the earlier bills enacted by the Congress—for instance, the old Civilian Conservation Corps—consisted of just a few sentences. We have commenced to enact legislation spelling out everything in so much detail, so it is just as much the fault of the Congress as the Office of Education, who write the regulations. People are complaining so viciously at the local levels it is time for the Congress and the Office of Education to work together to eliminate a lot of this paperwork and I will look forward to your testimony when you appear here later in the fall.

I intend to get this bill to the floor early next year.

Now, Dr. Relic, from your position as Assistant Secretary for Education, do you see any problems which the Congress has created for you in legislation in carrying out your task?

Dr. RELIC. I think generally the problems in the Office of the Assistant Secretary of Education in cooperation with the Secretary of HEW have been in not carrying out what Congress intended. So, rather than giving an onerous burden in any way to the Secretary of HEW and the Assistant Secretary of Education in coordinating, I think in the past it has been the ineffective carrying out of the desires and wisdom of the Congress rather than the other way around, and I believe that what is going on now is more responsive to what Congress intended, basically: coordination within an education division. So often in the past the Office of Education, because it administers the programs and has more than 90 percent of the budget, has been in fact synonymous with the Education Division, and that has therefore not taken into effective account the value of research and the value of the effective coordination of the other components of the Education Division, so while perhaps we can blame Congress for some things, perhaps not enough funding for NCES with all the mandated studies, I think the effective functioning of the Education Division is now our clear responsibility.

Mr. KILDEE. How often does the office review its staffing patterns? Is it done on a regular basis and what is the method of review on your staffing patterns?

Mr. BOYER. In the Office of Education?

Mr. KILDEE. Yes.

Mr. BOYER. I do not have evidence of a regular review. In my discussions with colleagues and in my review of the records in my office, I have not seen a pattern, Mr. Kildee. I think it has grown and been modified more by the development of legislation and new programs that have come on line and adjustments to that than probably a sequential administrative staffing review.

As I mentioned earlier in my testimony, we are very much involved in that at the start-up of the current administration, both as to the structure and the distribution of people within it. As illustrated in of the charts that are included in my testimony, it certainly raises a lot of administrative questions in my mind as to how we got where we are.

As to the schedule, I have been reminded there is an annual personnel report that is made up, of which I was knowledgeable, but I did not make that synonymous with what you had asked about, namely an evaluation. It seemed to me that was more of a reportorial statistically generated report.

Chairman PERKINS. Don't you think there is some way you can devise so that the proliferation of small programs does not interfere with the effective administration of the larger programs like Title I, Dr. Boyer?

Mr. BOYER. I believe that is possible. We created these organizations and these arrangements and yet somehow we feel they have enslaved us. Sometimes we can just declare the war won.

I think some of the programs that now are separated could well be brought together and maybe a common application form developed with some variation, with a common schedule, and a consolidation of the staff that reviews these applications. In that arrangement, we would make them programmatically effective, retain their integrity, and achieve administrative efficiency.

We have actually confused the question of efficiency and independence. You can have consolidation and still retain program integrity, but somehow we have concluded if you don't have an office and if it isn't dangling on the Christmas tree of a flow chart in some isolated way the program isn't important, or someone doesn't care. It is an illusion.

In the process, if we use our staff inefficiently, I think we have probably not been good stewards of the resonsibility.

To answer your question, I believe firmly we can make our programs more efficient, while still not in any way diminishing some of the smaller programs.

Mr. **Kildee**. That is very complementary to my question, Mr. Chairman. I appreciate that.

While in the state legislature I was in charge of tne Michigan Department of Education Budget. I had the reputation for being a big spender. I still have that reputation back home. But when I would have the department in, I really used to have kind of a zero-based staffing attitude. One of the questions I would ask of John Porter from time to time when we were going through the agency is, what would happen to students if we were to abolish this program. I was amazed at times that sometimes that question had not been asked internally. After all, the Department of Education within the Office of Education exists for students and I think that is what we should ask: What would happen to students—those being served by the Office of Education—if we were to cut staff here, if we were to abolish, maybe, this agency, or indeed if we were to add staff here and that is why I think it is extremely important that there be a regular, formalized review of staffing patterns.

You make, of course, recommendations to the congress on that.

I think what happens—in the 12 years I spent in the legislature we went through all the various romance programs. Certain things had a certain romance quality at one time and the legislature would appropriate money, and that very often would really be staffed up.

Another program that would come in would suffer and not have staff. We would be underloaded in one area and overloaded in another.

I think unless there is a constant staff review on a formalized basis to ask those questions internally—what would happen if we were to cut staff? What would happen to the students, I think that is basic to education.

I think that should be asked internally and brought to us also. We should be asking those things also.

Mr. **Boyer**. I support fully the thrust of your comment. I think it is possible for organizations generally to become quickly obsolete. We build organization, make assignments, create bureaus, create departments. Meanwhile, priorities change but the structure we have designed and the assignments of people don't change, all of which argues for, as you have well suggested, a continuing analysis that handles the question, "Does the structure as well as the management of people match the agenda?"

And does that match the needs of schools and children?

It is so easy to get removed from those very fundamental questions. I hope very much we can fulfill that mandate, Mr. Kildee.

I would say I have an early impression that, given the great array of programs in the Office, given the magnitude of the dollars involved, given the agencies through which these dollars flow, given the reporting and accountability mandates that we have—some 25 or 30 reports to congress every year, and 12 now that are mandated currently—that the Office of Education overall is very tightly staffed, if I am looking at the total workload and then looking at the number of people available, particularly professionals.

At the same time—and this is why Mr. Perkins' question is so relevant—if we are initially using that tight staff, which, incidentally, has also been compounded by ceilings—if these are misplaced, back to your point——

Chairman **Perkins**. Now, at that point, if the gentleman will yield, when you come back here in the fall you should be in a position to tell us what needs to be cleaned up, separate the wheat from the chaff, and get these programs on the path of better administration.

Mr. **Boyer**. That will be our charge. There are other constraints which I won't discuss now, but the objective is clear.

Mr. **Ford**. Mr. Commissioner, I am sorry I was unable to be here for the earlier part of the meeting to hear your testimony. I would like to say for the record that we are very pleased to have you serving as the Commissioner of Education. I am particularly pleased with the rapidity with which you have made known your style and your intent to respond to the requests of this committee.

I thank you for your speedy responses to me as chairman of Subcommittee on Postsecondary Education. You have indicated on every occasion a willingness to cooperate with us, to help us learn together. We do expect that some time this fall you will be able to lay out an entire agenda on what Federal aid to eduation ought to be with a complete checklist for us, so we won't have to do that work ourselves.

Could you tell me whether or not, pursuant to those very high-minded letters that were exchanged between members of this committee and the secretary earlier this year, there is a group now making a study of alternative methods of funding both elementary and secondary and higher education and student assistance? Are you actively working on that?

Mr. **Boyer**. Yes indeed. It is a high priority pattern, Mr. Ford, in the department. Here I think is an illustration of happy collaboration. We have organized within the department task forces. I am not in love with that term, but that is what they are called. These have been jointly staffed by the Assistant Secretary for Education by the Office of Planning in the Department, and by the Office of Education. We have focused on elementary and secondary authorization, and we have also focused on certain of the higher education programs, including NDSL. Those are going forward on a very tight schedule and it is really a very high priority with us.

Mr. **Ford**. I assume that this study of alternative financing of education is not limited to a study of just some of the programs, but to the total smorgasbord of elementary and secondary level programs.

Mr. **Boyer**. Yes. Of course, our priorities are driven in part by the reauthorization schedule, but the answer to your question is yes.

Mr. **Ford**. From my perspective, it is apparent that any perceivable inequity in a distribution formula that persists for very long erodes support in the education community nationwide for Federal programs. There is some evidence of that with respect to each of the programs to a varying degree. Some of it is unavoidable, but the very massive dislocations that have occurred as a result of several factors coming to bear at the same time on Title I in some parts of the country are causing real concern over the distribution of funds.

The second aspect of it is that we have been able to accomplish little or nothing in the last few years to address the continual complaints from school administrators about the rigid way in which Title I programs have to be structured in order to meet a variety of legislative and administrative rules that have been applied to them.

For several years we have had school administrators, particularly in fairly large school districts, telling us that as a practical matter they just have to develop a very limited unimaginative Title I program because if they do otherwise they invite harrassment from your office.

As a matter of fact, it was apparent for a period of time, that previous Commissioners were almost bent on driving school administrators away from Federal programs. For example, audit exceptions were issued across the country, for the most ridiculous and ludicrious kinds of miniscale differences.

I recall a school system being given an audit exemption because they used some of their own money to duplicate a TV network that had been established in conjunction with the parochial schools in the city with Title I programs. Someone came in from Cleveland and told us about one of the most imaginative uses of Title I money we ever heard, which teamed up the Cleveland Symphony Orchestra with outstanding musicians, only to be told that the expenditure of the very limited amount of Title I money to provide teachers to oversee this program had to be repaid by Cleveland because it appeared that some of these outstanding musicians did not come from target schools.

I feel someone over in your office should consider giving Congress some direction as to how we meet the problem of making the administration of these programs as flexible as possible. But the flexibility should be within the requirements that congress protect the integrity of the Federal dollars, as to dollar honesty and also protect such things as enforcement of the Civil Rights Act.

Over a period of time, school administrators have developed the belief that the committee continually has made programs like title I more difficult to administer. They believe your shop has taken what we have done as a foundation and built a framework which puts them in a cage so that there really is a disincentive to use their imagination in developing programs for children who most need assistance.

The best evidence of this is that we seem to have reached a plateau after a period of sometimes almost frenetic activity at the local school district level in developing new approaches as to how you deal with the special education needs of children. Suddenly it has cooled off somewhat and perhaps part of the diminishing interest can be attributed to a lessening of the interested which was exhibited in the 60's for funding new Federal programs. We have been responsible, by not expanding the horizons of that legislation and convincing administrators that the safe way to do it is the way it was done before.

Is it reasonable to expect that in considering alternative methods for financing elementary and secondary education, you will simultaneously be considering alternative methods of utilizing the present programs to answer these complaints that are coming from the education community?

Mr. **Boyer.** In looking at this problem internally, I think we have gone through a pendulum-swing.

My understanding is that in the early days there were uses made of Title I money that could not be justified and through audit examinations, which we do not control, there were exposures of at least questionable use of the dollars, to put it mildly, that caused everyone to feel that the program would be jeopardized if that kind of effort were allowed to persist.

I think in recent years there have been examples of the pendulum going too far the other way.

I agree entirely with your analysis, Mr. Ford, that from an administrative view, from the manager's view, from the school point of view—and I have been on the other side—programs can be so constrained and so particularized and so targeted that they are unreal, that they don't match the complexity of a school and its functioning. I think if that happens, then precisely the attitude develops that you mention. You lose heart. You say it is not worth it.

I believe firmly that we must at all costs avoid having these programs so brittle and so particularized and so managerially suffocated that they do not permit the school people to get on with the objectives for which they are intended.

There is no single rule you can lay down here. All you are doing is arguing for some middle ground that keeps you from slipping on the one side into a misuse of public monies and scandal and therefore lack of credibility in what you are trying to do and, on the other hand, drawing your procedures and your rules so tightly that people can't get the money to the students and the classrooms and use them the way they want.

I intend, of course, to insist on providing the maximum flexibility that will permit us to be accountable to you and also not to have an audit of the accounts that would cause the whole program to be jeopardized. I am totally sympathetic with the administrator who says, we cannot have encumbrances to the point where the ends are not achievable.

It cannot be artificial. It has to relate to the dynamics of the classroom and of the school.

Dr. **Relic.** Mr. Ford, may I also respond to your comment and question: I would like to emphasize, not only are we attempting to develop the coordinated program analysis and policy development internally between the Office of the Commissioner in OE and the Assistant Secretary for Education and the Assistant Secretary for Planning and Evaluation, but all 12 to 14 task forces have been involved extensively with community organizations too in analyzing program effectiveness.

Teacher groups, administrative organizations, parent organizations have been involved. In the two specific examples you cite concerning Cleveland and Detroit, we have had extensive communication with Dr. Jefferson in Detroit and Dr. Porter in Michigan and Dr. Briggs in Cleveland, and Dr. Walter in Ohio over examples just such as those which you cite. Hopefully, Congress can handle structuring and communications, but what kind of changes will come up? Will program services as delivered at the local level be better?

All we can say now is that commitment of the structure for communication and analyis of needs and problems is there and only the coming months will tell whether this will result in better services to the schools.

Mr. Ford. Mr. Commissioner, I certainly appreciate what you have said in your prepared statement and also what Dr. Relic has added. I am particularly pleased that Dr. Relic pointed out on page 10 that Secretary Califano has submitted to the President a proposed executive order to upgrade the Federal Interagency Committee on Education.

We have recently had occasion to try to examine with the Veterans Administration why they were in such deep disrepute in the educational community across the country. We came to the conclusion that one of the reasons was there had not been for a long period of time in the past very much coordination as required by statute, between the Commissioner of Education and the Veterans Administration in administering education programs.

We were given assurances by the new director that they were obtaining new personnel and taking a different approach. He said they would be amenable to following the directive that is in the legislation we passed last year requiring closer coordination.

As we hear people talking about a cabinet level Office of Education, I am sometimes bothered by what some people conceive such a cabinet level position to be. If I thought they were going to give a cabinet level secretary the same kind of half-way power in the field of education that you have, Mr. Commissioner, I wouldn't support that position at the cabinet level. Simply changing your job to a cabinet level job isn't going to answer the needs of the future in this country.

I don't know what the Administration ultimately is going to suggest about that early proposal for an Office of Education, but I suppose you know that this committree tried it in 1965. The original Elementary and Secondary Education Act, introduced by Adam Powell, had a Title VI in it which was the creation of the cabinet level position of Secretary of Education. The political flack that erupted as a result of that section was such that it was decided rather early in the game to drop the idea and not have the political problems with that kind of reorganization conflict passage of the legislation.

I think everyone on the committee assumed it was being set aside temporarily and we would get back to it soon. Not until the President started talking about this during his campaign did we hear any discussion around town about the possibility of doing this. I certainly hope that from your vantage point you will be able to encourage in the reorganization the establishment of a central person like yourself to be an adviser to government educational policy.

I sometimes wonder if the bureaucrats who are engaged in writing regulations on education programs, particularly in higher education, even approach them in the same language because there are wide differences.

There is nobody we can blame this on in the bureaucracy perhaps because we haven't organized it properly.

This committee is very conscious of the reorganizational efforts you have made and the steps you have already taken to get rid of some of the red tape-generating operations over there you will be long remembered as a great man in your position. If you did nothing more than what you have already set in motion. We are hoping to see that kind of change continue.

Having said some nice things, I now would like to call your attention to a letter I wrote you just a few days ago pointing out to you that the bureaucrats—that Detroit school people met with recently responded in a most intelligent and enlightened way. The Executive Deputy Commissioner was especially helpful mainly because he agreed with the view we have of what the law says. But the professional people who were at that meeting to advise him hit the door with their heads going to and froin the fashion developed during the eight years of the Nixon-Ford administration. They never quit shaking their heads no. They came up with the most convoluted kind of reasoning for making life difficult for a large school district that you could imagine. They literally made it impossible for me to try to explain afterward as a member of this committee to the Detroit officials how they could be in the position of having a Federal judge telling them to do a particular thing in a desegregation order and having the Office of Education saying, "If you do it, you won't qualify for desegregation funds."

Obviously that was not a result to be desired or intended by people who drafted the Emergency School Assistance Act and rewrote it.

What I wrote to you the other day was not so much to argue the question of how the law should be interpreted, but to register with you my very firm impression that a solution was not going to be reached as long as the employees of the Office of Education approached it in a negative way.

Dr. John Ellis was involved in prolonged discussion indicating his understanding of the problem and his willingness to be helpful, but it was apparent to my staff that the staff members trying to assist him were still operating under the old rules. It is going to take some time for the word to get down through the ranks that we have a new ballgame and a new boy on the other end of the street running things and it isn't like it used to be. The word should be spread that we are in business to try to make these programs work, not to figure out ways to make it difficult for school administrators to live with them.

When Federal judges read a Federal law and think they are writing a court order pursuant to the way the Federal law was written, and then someone up here says, "Aha, we have found a way to thwart that. Although a Federal court has told you to do something, if you do it, we are going to say it is contrary to the intent of Congress that we give you the money to accomplish it—even though the law on its face was passed for that purpose."

This sort of thing became commonplace for a period of time in the Office of Education. What is happening now, however, is that people are speaking up because they really think something has changed since the beginning of the year in Washington. They have very high expectations for you, Mr. Commissioner, because they perhaps expect more change than is possible.

I think the rest of the committee members will agree with me that we will be more than happy to cooperate and will go to any length to accommodate your ideas on how to bring about change in the administration of the education programs. We will try to facilitate the kind of suggestions you have made in your statement today.

You quite forcefully point out and spank the Congress a little bit for the way in which we have legislated the structure of your organization. The example that you use, as I recall it, is the bilingual program and the way it is fragmented. We had the folks from bilingual in a few weeks ago. We were a little bit surprised to find that although they all work for the same government and the same agency down there, while they sat at the table here they had a different idea, each of them, about how bilingual programs were supposed to work and what their policies were supposed to be.

We are perhaps responsible because we passed it in pieces, but no one has ever really called that to the attention of the committee before.

I think if you legislatively wanted to disassemble or reassemble the administraive mess that we have created over a period of time, that this committee would consider that kind of legislation very quickly.

Reorganization would prompt good government and probably wouldn't cost any money. I think the committee would be anxious to cooperate with you in undoing these things if we compiled the documentation why the confrontation between this committee and your predecessors led to some of this structuring. Often a disagreement between the administration and the congress on the importance of a particular program led the committee to try to prevent that program from falling through the cracks by giving both the program and its supervisor a special status.

We didn't do that in the 60's with the commissioners who were aggressive in running the office down there, and this encouraged a sense of distrust or lack of cooperation between the congressional committees and the Office of Education. We probably can go back and say we are sorry and undo some of those things, now that we have a new commissioner and undo some of those things. We would probably do it quickly if you sent a request up here to do it.

Mr. BUCHANAN. I must say, Bill, that your fellow Democrat who was Mr. Ford's Secretary of HEW, might say some folks down there have been shaking their heads at him. I am not sure how much we can do about it, but I think you will find we will cooperate.

I think we discussed this in an earlier hearing, but some of the program people at OE have charged that the 40-day layover on regulations might severely hamper program administration. I wonder if there are any instances where money has lapsed specifically because of this provision as opposed to late appropriations. Do you have any comment on that?

Mr. **Boyer**. My colleagues who have watched this a little longer than I say we don't know of a circumstance where that would have occurred, Mr. Buchanan.

Mr. **Buchanan**. We ran across information recently on an evaluation contract where the overhead rate was 119 percent. I wonder if anyone could tell me how that could be, how that rate is established, how many contracts are rated in excess of 50 percent, and how many are rated in excess of 100 percent.

Mr. **Boyer**. I don't know the example to which you refer. It is an amazing figure.

Mr. **Buchanan**. I will have to get it to you.

Mr. **Boyer**. I will be happy to see it and will for the record indicate my own experience from the other side, which is that that goes far beyond any normal circumstance an overhead rate would justify and I think what has been emerging is kind of an "normative" ceiling—that is a contradiction in terms—in Federal overhead requirements. I was for a number of years Chairman of the Board of the State University of New York Research Foundation, which did a great deal of contract and overhead business with the Federal Government in many agencies and we were always trying to get it up around 20 percent, as I recall.

It is, from an administrative view, hard for me to justify anything that approaches the figure you quoted.

Mr. **Buchanan**. You are indicating you do not think that is typical or that that would be a large number of contracts?

Mr. **Boyer**. I can't imagine it would be. Now that you raise it, I would like to inquire into what our pattern is. I have not seen the overhead summary of the OE authorizations on that, Mr. Buchanan, but I will seek a summary on that and get it to you.

Mr. **Buchanan**. In that same vein, I would like to know how the Office of Education determines what indirect cost rates a state education branch or university will be permitted to charge and what the indirect costs are for state education agencies and for postsecondary institutions.

Mr. **Boyer**. I will provide factual information on that. I do not have it at hand. I do know that institutions are extremely concerned about the overhead issue. With tight budgets, they do not want to take on dollars that then erode their own basic operational budget. I am sympathetic to the other side as well.

At the same time, I think those who make grants are deeply concerned that the overhead does not become a device for a general revenue source so there is a legitimate watchdog interest on that side I must tell you this is the first time that I have had reason to examine the OEO overhead pattern, but I will inquire into that immediately and get an actual summary to you.

[The information follows:]

EXOTECH, the case cited in the testimony but not specifically named, like all profit making organizations, figures its overhead rate as a percentage of *direct salaries* only. The quoted rate of 119 percent is in the normal range—profit making organizations' overhead rates typically run between 100 and 125 percent.

Non-profit organizations, on the other hand, figure their overhead rates as percentages of *total costs*. Their overhead rates are typically 20 to 25 percent.

Overhead rates in the abstract mean nothing. We must know how they're figured and what percentage they are of total costs to make any kind of judgement. Usually, profits and non-profits come out pretty close when we look at overhead rates in terms of total dollars. In the EXOTECH contract, for example, the overhead rate was only 30 percent of the total contract cost of $318,641. In fact the 119 percent rate was only for one year. For the entire contract the overhead payment was $95,237, or 73 percent of the total labor charges of $130,692.

We should also point out that overhead rates for all organizations with which the government contracts are set through negotiations by various Federal audit groups, the largest of which is the Defense Contract Audit Agency. We at OE must use the set overhead rate for each organization with which we contract—we have no latitude whatsoever to negotiate the overhead rate set by the cognizant audit agency.

Mr. BUCHANAN. Very good. Thank you, sir.

Section 426 provides for certain technical assistance. I wonder how the Office of Education executesthese technical assistance provisions?

Mr. BOYER. As I recall, that was one of the questions that had been included in Mr. Perkins' original series.

Mr. BUCHANAN. I will look for it in the record.

Mr. BOYER. I do not have more information though when I inquired into that before coming here I was led to believe that we have not dealt with that as a separate section and have in fact not been involved in technical assistance in a general way. The technical assistance we have provided usually has related to other authorizations, other bills and other particular programs, but I will certainly fill in that general impression with more specific information for the record.

Mr. BUCHANAN. I would like to join Chairman Ford in complimenting your leadership thus far. I really think you are headed in the right direction and I hope we can work together to bring about an improved situation in the Ofice of Education.

Mr. BOYER. Thank you very much.

Mr. FORD. Mr. Commissioner, one other thing we would like to ask you to look at in your shop over there. It first came to my attention in 1974, when we were dealing with the last really great readjustment of formula in the elementary and secondary programs. At that time we discovered a wide variance between the statistical data base from the Library of Congress and the Office of Education when we were trying to examine what happens when you did particular things with particular formula.

In one program, it is my recollection that the Office of Education couldn't answer the question on the basis of the information you had, although it is a program you administered. In fact, we discovered later that the figures that the Library of Congress gave us almost instantly overnight were more accurate than the Office of Education. Subsequently, on the basis of the inaccurate Office of Education figures, we made some decisions in the middle of the night in a conference on impact aid that proved not to do what we thought they were going to do.

We haven't been able to undo the damage yet.

Recently we discovered the same thing with respect to asking for statistical data on the Basic Educational Opportunity Grant program. We found when we asked the computer at the Library of

Congress we got a very different answer than we did from the information that your shop was able to give us.

Is there any way that you could have someone undertake a study of how your data bank compares to others? For example, it is sort of accepted around the Hill that it is better to go to the U.S. Air Force data bank on statistical data for Title I than it is to go to you. That doesn't make any sense to me but, nevertheless, there are people who want to get information in a hurry and who have discovered it is easier.

If this sort of thing has happened, don't you think it would be worth some time and money to have someone take a look at whether or not the Office of Education computer operation should be updated?

We used to accuse the employees down there of playing games with us. It is only in the last couple of years that I have softened my attacks on the employees because we discovered they werent lying to us; they just didn't know.

Mr. Boyer. One should be penalized less for innocence.

I have an impression. My understanding is that most of the information we are called upon to provide probably comes initially from NCES in many areas. I don't see within OE frankly, Mr. Ford, a major data recovery system. The primary sources in most instances is through NCES. I think that the BEOG program is clearly an exception. Because the program is within the Bureau, whatever miscalculations or inaccuracies are reported on those data do come out of estimates in OE.

I guess I am saying that little support has been given to OE to build up what might be called a general data bank. Now, there are exceptions. It is true in the basic grant program our people have tried to deal with the calculations and, as you know, based on our resubmission on our request, we missed the target this year and made a revision.

It raises a broader question. The fact that we seem to have available in the Library of Congress a reliable source just causes me to speculate as to whehter we are missing a bet by not seeking answers there—or if the Air Force has a General over there with more knowledge of Title I than we do—that sends off all sorts of signals, like choosing the wrong profession and other things.

I wonder if your question doesn't force on me the thought that, given our limited resources, that we probably would be mistaken to duplicate if we can find available, either through NCES or other sources such as the Library of Congress, a valid and reliable source.

It is embarrassing. In fact, our credibility hits bottom if we send out figures that based upon other checkpoints shows we aren't on top of the data relating to our own program. That is indefensible. I will certainly make this a matter of inquiry internally and where we are unable to deliver, then not pretend to deliver and try to find ways to have access to sources that we think would be the most reliable.

Mr. Ford. I might just suggest a perfect starting point is the Impact Aid Program. It was demonstrated in 1974 when we tried to strengthen the operation of NCES. While the administration was willing to make recommendations with respect to substantial changes in the program, they couldn't answer very simple questions about what happened when you made the changes.

Mr. **Boyer**. I am reminded those are our figures, the Impact Aid figures. I don't want to in any way slip off responsibility.

Mr. **Ford**. Most of the members of this committee trust the figures presented by the Impact Aid superintendents and the ones generated in your office because you don't seem to have as many variables cranked into your base as they have and they can come up with scare stories very quickly. But the minute you start moving the formula, they can name twenty school districts you are going to put out of business. It would be important that as a starting point there be no question in anybody's mind that the statistical basis for making a decision was accurate.

Mr. **Boyer**. The point you make is valid. There have been attempts in the past to make policy moves without backing it up with data to let you know what the impact is going to be educationally.

I have seen that in a number of recommended changes in the budget and I think that is inappropriate. If we can't give a profile as to what the educational fallout is going to be in a given legislative or fiscal proposal, then I think we have not done our homework sufficient to justify it. That applies to impact aid; that applies to our moves in modification of student loans. I mean the obligation we have in several instances where there have been some differences in level of funding. What is the result programmatically? That reduces itself to data through as careful an analysis as we can make, because eventually you are talking about tudents and schools.

Mr. **Ford**. We also in the past have not been able to get anyone to seriously consider we must fight in the Labor/HEW appropriations bill to get $60 or $65 million a year which is promptly turned over to the Defense Department to run their schools. Why isn't that in the Defense Department budget?

The Department of Defense schools appropriation is counted off against your part of the budget and ends up over at the Defense Department where they can get all the money they want for almost anything they want. We are subsidizing the Defense Department, in other words, with the lobbying efforts at funding time by the American public school systems. It hasn't made much sense to some of us, but nobody in the administration in recent years has been willing to tackle that and tell us what are the political problems are involved in simply giving up those schools to the Defense Department to let them run them as they do overseas.

Recent conversations have indicated to me they believe they could run them much more economically and efficiently than they are presently being run in the variety of arrangements they have around the country, if they were free to do so.

Nobody in the Defense Department apparently cares enough about those schools to be concerned about them. Since we don't have anybody in your shop that really has anything to do except pass the money out to them, nobody over there has cared much about what happens to these schools. They just sort of exist out there. I hope while looking at the totality of what ought to be done with Impact, you will take a look at the question of whether we ought to be dealing with those schools in the way in which we are dealing with them.

Mr. **Boyer**. Thank you. I will certainly investigate that matter. As a general principle, it is not appropriate to promote and defend someone else's budget.

Mr. **Ford**. I think I have mentioned to you I could show you where, in a stone's throw of the Capitol, schools which were built under that program for the express and exclusive purpose of providing segregated all-white education for certain children. A former Member of Congress boasted to us that he succeeded in getting this done so these children could be protected from what he considered to be the disadvantages of an integrated public school system. That is one of the things that drew it to the attention of some of us.

Since then we have wondered who you complain to about something like this.

Dr. **Relic**. Mr. Ford, may I react to your last two comments?

Mr. **Ford**. Yes.

Dr. **Relic**. While the Federal Interagency Committee on Education is an appropriate forum for dealing with some problems, such as I mentioned earlier, a coordinated policy for education, and also a comprehensive education policy, it would not be an appropriate forum for the question you raise concerning Defense schools. Because it is so political in nature, perhaps it could be addressed to the reorganizational efforts now going on in the White House to consider precisely where all education functions should go.

Mr. **Ford**. We could amend the Impact Aid Act very simply and just cut them loose and the Defense Department will handle it.

The Defense Department school system is not a statutory school system. There are a number of statutes that affect the way in which it operates, but from year to year it is kind of a creature of the appropriations process. It was sort of a fallout. Somebody said we may be in Germany for a couple of years occupying this country, so in 1946 they started with a school and now it has grown to a school system with some 185,000 students and a very substantial budget. It would be the fifth largest school district in the country if it were located in the United States.

Now, that school system that grew up overseas and its whole educational function within the Office of Education, has had very little concern about education within the country because of the existence of Section 6, and yet no one talks about changing Impact Aid.

I tried to bargain with Mr. Lance on the idea that he could claim a 10 percent cut in Impact Aid if he would simply cut them loose in this year's budget, Of course, from his point of view that didn't help him at all because he then would have to put the $65 million back on the other side and it didn't balance his figures. It made our figures look better, but it didn't make his figures look better. I think it is something we can do very directly and that the Defense Department has the power and would respond to an initiative coming from us.

If there was legislation pending to do this, we would hear from them in a hurry. As a matter of fact, Mrs. Mink offered an amendment to simply do this a few years ago and we suddenly got more attention from the Defense Department on Impact Aid than you could posibly imagine. Suddenly they realized that they had something at stake in the Impact program.

Mrs. Mink had a very well-earned reputation for being able to wake up bureaucrats in that fashion. She also had a friend in the Hawaiian Legislature who introduced a bill to keep Defense Department children out of the public school system unless they were paid for, which rattled some people around here with the realization that if we moved too quickly with a program like Impact Aid and it provokes retaliation, we ought to know what kind of American kids put where by the government are going to be affectd by it.

As you probably know, there is a special provision in the budget that is a kind of an inducement to Louisville, Kentucky, to educate the children of the military at Fort Knox. They are not required to under the Kentucky law. There are many states that in fact are not required to educate a number of the children we are paying partially for with Impact Aid and it is one of the forms of political retaliation that could be triggered if we move too quick. I hope we really build a good picture of this whole thing before recommendations are made and we do get some legislation to approve it.

Mr. Buchanan.

Mr. BUCHANAN. No questions.

Mr. FORD. In his State if we move too quickly they will secede again.

Mr. BUCHANAN. We can get Foreign Aid and get more money.

Mr. FORD. Mr. Commissioner, we want to thank you for your appearance and for your cooperation with the committee. I repeat our sincere willingness to work with you to accomplish any of the goals you have set for us here as elements of change you would like to make. We are pleased to see movement.

Mr. BOYER. Thank you very much, Mr. Ford, and members of the committee.

Mr. FORD. It is always a pleasure to hear from you before this committee. We expect we will be hearing a lot from you this fall when you bring back the manifesto for the future of education.

Mr. BOYER. Thank you, Mr. Ford.

[Whereupon, at 11:40 a.m., the subcommittee was adjourned.]

PART 10: ADMINISTRATIVE STRUCTURE OF THE EDUCATION DIVISION (ADVISORY COUNCILS)

TUESDAY, AUGUST 4, 1977

House of Representatives,
Subcommittee on Elementary, Secondary
and Vocational Education,
Committee on Education and Labor,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9 a.m., in room 2175, Rayburn House Office Building, the Hon. Ronald M. Mottl presiding.

Members present: Representatives Mottl, Kildee, Buchanan, and Pressler.

Staff present: John F. Jennings, majority counsel; Christopher Cross, minority senior education consultant; and Nancy L. Kober, staff assistant.

Mr. Mottl. The subcommittee will now come to order.

Chairman Perkins is at the White House and will be here shortly.

Also, we certainly want to welcome our distinguished panel here this morning. At the outset I would like to suggest if they can, they summarize their position, because the House goes into session at 10 o'clock; we have your testimony and all of your statements will be submitted for the record without objection.

The Chair hears no objection. So if the panel would come forth after we take the names.

Today's hearing is on the subject of advisory councils. We will first hear from Dr. Albert Alford of the U.S. Office of Education, who will give us an overview of all legislatively required advisory councils for programs administered by the Office of Education. This overview will include advisory councils at the national, State, and local levels.

Next we will hear from a panel of representatives of the 10 advisory councils for the programs which are currently under review by the subcommittee. The only other education advisory council for a program within the subcommittee's jurisdiction is the National Advisory Council on Vocational Education, whose activities were reviewed in 1975 and 1976 and whose functions were revised in the 1976 Education Amendments.

Doctor, before we start with you, if the panel would like to come forward and make themselves comfortable around the head table, please do so. We are going to have with us on the distinguished panel Dr. Gary Eyre, executive director, National Advisory Council on Adult Education; Dr. Wilbur Lewis, Vice-Chairman, National Advisory Council on the Education of Disadvantaged Children.

I want to give a special welcome to Dr. Lewis because he is my former next-door neighbor and former superintendent of schools in Parma, where he did a terrific job, and is now in Tucson, Ariz.

Then we have Mrs. Gwen Awsumb, Chairperson, National Advisory Council on Equality of Educational Opportunity; Thomas Thompson, Chairperson, National Advisory Council on Indian Education; Ms. Joy R. Simonson, Executive Director, National Advisory Council on Women's Educational Programs; James Lehmann, Council Member, National Advisory Council on Bilingual Education; George Meyer, Chairman, National Advisory Council for Career Education; we have Dr. Martin W. Essex, Chairperson, Community Education Advisory Council.

Also I would like to give a special welcome to Dr. Essex, a longtime friend of mine, who did an outstanding job as a superintendent of schools for the State of Ohio for many years, and as a superintendent of schools in my congressional district. So a special welcome to you, Dr. Essex; we are glad to have you aboard.

We have Ms. Victoria Mongiardo, representing Frank Femminella, Chairperson, National Advisory Council on Ethnic Heritage Studies; and last but not least is Dr. Peter Relic, Deputy Assistant Secretary for Education, representing Dr. Mary Berry, Assistant Secretary for Education, Presiding Officer, Advisory Council for Education Statistics.

I would like to give a special welcome to my dear colleague from Ohio, Dr. Relic, who, as I said before, we played football against one another in high school. He is doing a great job with the commission here.

I would like to welcome all those Ohioans. We will start right now with Dr. Alford.

STATEMENT OF DR. ALBERT L. ALFORD, ASSISTANT COMMISSIONER FOR LEGISLATION, U.S. OFFICE OF EDUCATION, ACCOMPANIED BY MS. ANN BAILEY, COMMITTEE MANAGEMENT OFFICER, U.S. OFFICE OF EDUCATION, HEW; DR. GARY A. EYRE, EXECUTIVE DIRECTOR, NATIONAL ADVISORY COUNCIL ON ADULT EDUCATION; DR. WILBUR H. LEWIS, VICE-CHAIRMAN, NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN; MRS. GWEN AWSUMB, CHAIRPERSON, NATIONAL ADVISORY COUNCIL ON EQUALITY OF EDUCATIONAL OPPORTUNITY; THOMAS A. THOMPSON, CHAIRPERSON, NATIONAL ADVISORY COUNCIL ON INDIAN EDUCATION; MS. JOY R. SIMONSON, EXECUTIVE DIRECTOR, NATIONAL ADVISORY COUNCIL ON WOMEN'S EDUCATIONAL PROGRAMS; JAMES LEHMAN, COUNCIL MEMBER, NATIONAL ADVISORY COUNCIL ON BILINGUAL EDUCATION; GOERGE MEYER, CHAIRMAN, NATIONAL ADVISORY COUNCIL FOR CAREER EDUCATION; MARTIN W. ESSEX, CHAIRPERSON, COMMUNITY EDUCATION ADVISORY

COUNCIL; MS. VICTORIA MONGIARDO, REPRESENTING FRANK FEMMINELLA, CHAIRPERSON, NATIONAL ADVISORY COUNCIL ON ETHNIC HERITAGE STUDIES; DR. PETER D. RELIC, DEPUTY ASSISTANT SECRETARY FOR EDUCATION, REPRESENTING DR. MARY BERRY, ASSISTANT SECRETARY FOR EDUCATION, PRESIDING OFFICER, ADVISORY COUNCIL FOR EDUCATION STATISTICS, AND MS. ROBERTA LOVENHEIM, EXECUTIVE DIRECTOR, NATIONAL ADVISORY COMMITTEE ON DISADVANTAGED CHILDREN

STATEMENT OF DR. ALBERT L. ALFORD

Dr. ALFORD. Thank you

I would like to introduce Ms. Ann Bailey, the Committee Management Officer of the Office of Education, and repository of detailed information about these activities.

I might indicate I was raised in Ohio. Maybe this is Ohio Day.

Mr. MOTTL. Very well.

Dr. ALFORD. It is a pleasure to be here this morning to discuss with you briefly an overview of the National Advisory Committees and also some comments on State and local advisory committees. I will try to cover both areas. As you have indicated, our testimony will be in the record. I will give highlights of my testimony in this area.

[Prepared statement of Dr. Alford follows:]

Statement by
Dr. Albert L. Alford
Assistant Commissioner for Legislation
U.S. Office of Education
Department of Health, Education, and Welfare
Before the
Subcommittee on Elementary, Secondary, and Vocational Education
Committee on Education and Labor
U.S. House of Representtives
Washington, D.C.
Thursday, August 4, 1977

Dr. Alford is accompanied by:

Ms. Ann V. Bailey, Committee Management Officer, U.S. Office of Education, HEW

Mr. Chairman and Members of the Subcommittee:

It is my pleasure to be here this morning to make a brief presentation on the status of advisory councils related to the Office of Education or its programs. I will provide what information we have been able to gather on State and local advisory councils as well as the National councils.

National Advisory Committees

Turning first to the National advisory councils I would note that we now have 16 such councils in the Office of Education, not counting the National Advisory Committee on the Handicapped which was not renewed and expires September 30 of this year. Table 1 lists them by basis of appointment, statutory or non-statutory. Only two of the councils fall in this latter category. Table 2 provides some general summary information for calendar year 1976 on membership and meetings, staffing and costs. I realize that you are getting detailed information from each of the councils directly, but we will be happy to try to provide additional or supplementary information you may need from our files.

The number of advisory councils in the Office of Education has been declining in recent years. From a high of 26 in 1969 we are now down to 17 and will be reduced to 16 by October 1.

Last year (1976), for example, the Commissioner abolished two councils, the advisory Committee on Bilingual Education and the National Council on Quality in Education under his authority through procedures provided by Section 448(b) of the General Education Provisions Act, and

OFFICE OF EDUCATION PUBLIC ADVISORY COMMITTEES

STATUTORY

Presidential Advisory Committees

- Adult Education, National Advisory Council on
- Disadvantaged Children, National Advisory Council on the Education of
- Equality of Educational Opportunity, National Advisory Council on
- Extension and Continuing Education, National Advisory Council on
- Indian Education, National Advisory Council on
- Vocational Education, National Advisory Council on
- Women's Educational Programs, National Advisory Council on

Secretarial Advisory Committees

- Bilingual Education, National Advisory Council on
- Career Education, National Advisory Council for
- Community Education Advisory Council
- Developing Institutions, Advisory Council on
- Environmental Education, Advisory Council on
- Ethnic Heritage Studies, National Advisory Council on
- Financial Aid to Students, Advisory Council on
- Handicapped, National Advisory Committee on the *

ADMINISTRATIVELY CREATED

- Accreditation and Institutional Eligibility Advisory Committee
- Black Higher Education and Black Colleges and Universities, National Advisory Committee on

* Terminates 9/30/77

Interagency Report Control No. 1191-GSA-[illegible]

ANNUAL REPORT ON FEDERAL ADVISORY COMMITTEES SUMMARY SHEET

1. DEPARTMENT OR AGENCY HEW/OE

3. CALENDAR YEAR 1976

2. EXACT NAME OF ADVISORY COMMITTEE (List alphabetically. See SF 2?? Block #1. Indent and list subcommittees or other subgroups under parent committee.)	COMMITTEE STATUS DURING THIS CY					ESTABLISHMENT AUTHORITY				COMMITTEE TYPE			TOTAL NUMBER REPORTS	MEETINGS			PERSON YEARS Federal Staff Support (Whole Numbers & Fractions)		COSTS		TOTAL NUMBER OF MEMBERS
	a	b	c	d	e	a	b	c	d	a	b	c		a. Total open	b. Total closed	c. Total partially closed	Current year	Next year	Total Annual Cost Current Year (Whole Dollars)	Total Annual Cost Next Year (Whole Dollars)	
	SF 248 Block # 4					SF 248 Block # 5				SF 248 Block # 6			SF 248 Block # 13	SF 248 Block # 14			SF 248 Block # 15a		SF 248 Block # 15b		SF 249 Block # [illegible]
Accreditation and Institutional Eligibility Advisory Committee		X						X			X		1	11	0	1	7	7	200,520	217,220	15
Advisory Committee on the Education of Bilingual Children				X		X					X		0	0	0	0	0	0	0	0	8
Advisory Council on Developing Institutions		X				X					X		1	3	0	0	1 2/4	1 2/4	52,000	75,000	9
Advisory Council on Environmental Education		X				X					X		1	6	0	0	1 2/4	3/4	35,695	48,050	14
Advisory Council on Financial Aid to Students		X				X					X		1	4	0	0	1 2/4	1 2/4	60,000	65,000	20
Community Education Advisory Council		X				X					X		3	5	0	0	1 1/4	1 1/4	187,000	273,000	7
National Advisory Committee on the Handicapped		X					X				X		2	4	0	0	2 3/4	2 3/4	128,149	133,069	15
National Advisory Council for Career Education		X				X					X		1	6	0	0	1 1/4	1 1/4	150,133	260,861	8
National Advisory Council on Adult Education		X				X					X	X	2	13	0	0	7	7	291,842	291,359	15
National Advisory Council on Bilingual Education		X				X					X		1	12	0	0	2	2	136,000	136,000	14

* If continuation of this summary listing is required, use this same form SF 250 [illegible]

(See instructions on reverse)

STANDARD FORM 250 (Rev. [illegible])

1b

Interagency Report Control No. [illegible]-GSA-A[illegible]

ANNUAL REPORT ON FEDERAL ADVISORY COMMITTEES SUMMARY SHEET

1. DEPARTMENT OR AGENCY: HEW/OE

2. CALENDAR YEAR: 1976

EXACT NAME OF ADVISORY COMMITTEE [illegible]	COMMITTEE STATUS DURING THIS CY (SF 248 Block # 4)					ESTABLISHMENT AUTHORITY (SF 248 Block # 5)				COMMITTEE TYPE (SF 248 Block # 6)			TOTAL NUMBER REPORTS (SF 248 Block # 13)	MEETINGS (SF 248 Block # 14)			PERSON YEARS Federal Staff Support (Whole Numbers & Fractions) (SF 248 Block # 15a)		COSTS (SF 248 Block # 15b)		TOTAL NUMBER OF MEMBERS (SF 248 Block # 4A)
	a	b	c	d	e	a	b	c	d	a	b	c		a. Total open	b. Total closed	c. Total partially closed	Current year	Next year	Total Annual Cost Current Year (Whole Dollars)	Total Annual Cost Next Year (Whole Dollars)	
National Advisory Council on Education Professions Development					X	X					X	X	4	3	0	0	4 2/4	0	186,250	0	10
National Advisory Council on Equality of Educational Opportunity		X				X					X	X	1	9	0	0	3 2/4	4 2/4	179,000	185,000	14
National Advisory Council on Ethnic Heritage Studies		X				X					X		1	3	0	0	4 3/4	1	31,000	40,000	10
National Advisory Council on Extension and Continuing Education		X				X					X	X	1	15	0	0	6 2/4	6 2/4	325,931	263,368	18
National Advisory Council on Indian Education		X				X					X	X	1	4	4	2	4 2/4	4 2/4	265,778	246,652	15
National Advisory Council on the Education of Disadvantaged Children		X				X					X	X	2	12	0	1	8 2/4	8 2/4	281,825	281,505	10
National Advisory Council on Vocational Education		X				X					X	X	9	10	0	0	12 2/4	12 2/4	437,965	437,410	21
National Advisory Council on Women's Educational Programs		X				X					X	X	1	32	0	0	6	6 3/4	318,712	316,588	20
National Council on Quality in Education				X		X					X	X	0	0	0	0	0	0	0	0	0
		16		2	1	18			1		29	9	33	152	4	4	72 2/4	69 1/4	3,267,800	3,270,082	243

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(See instructions on reverse)

STANDARD FORM 248 (Rev. [illegible])

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the Congress did not renew the authority of the National Advisory Council on Education Professions Development. This year one new council came into being--the National Advisory Committee on Black Higher Education and Black Colleges and Universities, and the Congress has let the previously mentioned advisory committee on the handicapped expire.

A comprehensive review of national advisory councils has been conducted annually since the passage of the Federal Advisory Committee Act in 1972. This year, the President added the dimension of a zero-base review. Each agency was asked to make its recommendations for elimination and consolidation of councils, as appropriate. We have made our recommendations and these have been transmitted to the Office of Management and Budget.

The Office of Education has proposed to continue four existing councils which serve very special need areas and deal with minority groups, or are an integral part of program administration. These are the National Advisory Council on Indian Education, National Advisory Council on Women's Educational Programs, Accreditation and Institutional Eligibility Advisory Committee and the National Advisory Committee on Black Higher Education and Black Colleges and Universities.

Two councils were recommended for termination--the Advisory Council on Environmental Education and the National Advisory Committee on the Handicapped. The latter, as noted, was recently terminated by Congressional action.

We also proposed the merger of the remaining eleven councils into five broad-based councils which would advise the new program bureaus and the Commissioner. This new grouping would be as follows:

1. National Advisory Council on Education and Work--to cover the areas of the National Advisory Council on Adult Education, National Advisory Council on Vocational Education, and the Community Education Advisory Council.
2. National Advisory Council on Elementary and Secondary Education--to cover the areas of the National Advisory Councils on the Education of Disadvantaged Children, and Equality of Educational Opportunity.
3. National Advisory Council on Student Financial Assistance--the Advisory Council on Financial Aid to Students would be revised to take on oversight of programs being transferred to the new Bureau of Student Financial Assistance.
4. National Advisory Council on Higher and Continuing Education--would cover the areas of the National Advisory Councils on Extension and Continuing Education, and Ethnic Heritage Studies, and the Advisory Council on Developing Institutions.
5. National Advisory Council on Special Programs--areas covered by the National Advisory Council on Bilingual Education and National Advisory Council on Career Education would be covered. Functions could be expanded to include other special priority programs such as Right-to-Read, Teacher Corps, and Arts and Humanities, all of which report to the Commissioner rather than to a Bureau.

The two bureau structures not covered by these mergers would be taken care of by existing councils--the Office of Indian Education by the retained council in that area, and the Bureau of Education of the Handicapped partially, at least, by related councils already existent in the Department.

We do not know what the final recommendations of the Office of Management and Budget and the President will be but it appears likely that they will call for a substantial reduction in the number of advisory councils. The President used the term "compelling need" in his memorandum of February 25 concerning the justification of retaining non-statutory councils or committees.

The Congress is not under any such restriction in establishing or retaining these organizations, but it may be appropriate to examine more closely in the future whether advisory councils are really needed for every program. National advisory councils in the past have been appointed to serve a number of roles by legislative mandates:

1. To advise the Commissioner, Secretary, President and the Congress in newly emerging areas where a broad, non-bureaucratic view may be needed.
2. To advise and sometimes even help develop program regulations and guidelines, and priorities.
3. To make legislative recommendations for modifications.
4. To oversee the grant approval process and in some cases having to certify the awards.

In addition a number of the councils might be described as having developed as an advocacy group for the interests served and a lobbying force for program retention.

In more recent years, a number of conditions have changed which we believe modifies the need for national advisory councils.

First, Federal education programs are fairly well established and we are not moving as extensively into new and perhaps unchartered areas as was true a decade or more ago.

Secondly, the Congress itself in its expanded oversight and legislative role provides very effective advice on a periodic basis--advice with a bite.

Thirdly, the Congress has provided the Department with adequate authority to appoint ad hoc committees or councils to provide specific advice and counsel when special needs for expertise or outside review becomes necessary. These short term councils and committees have the advantage of providing fresh current advice.

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With the new open approach by the Executive Branch to the development of legislative proposals and regulations involving large segments of the public, another function which in the past was fulfilled by advisory councils may to a large extent be superseded.

While national advisory councils may still play an important role, particularly as we may on occasion move into new, critical areas we believe that it is an instrument which needs redesign in the light of changing conditions, and a more cautious use.

State and Local Advisory Councils

In an effort to achieve a wider interest, and a greater involvement in Federal educational programs on the part of parents, leaders of State and local groups and organizations, and the general public, the Congress has required that State and local advisory bodies of various types be created. Beyond being an advocate for the specific group which the discreet legislation intends to assist, the advisory bodies are usually required to give general oversight to the development of projects, the administration of grants, and to the evaluation of the program.

There is considerable variation among the educational programs authorized by the Congress as to the responsibility and authority provided for State and local advisory bodies. These range all the way from a detailed description of functions and activities with specifically authorized funding to a very casual mention that each recipient of funds shall establish a community council.

For larger programs which call for a prominent State role, such as State Plan type programs, the statutes frequently call for a State advisory council. This type of legislation often provides considerable detail as to the functions, responsibility, and financing of such councils. For such programs, the statutes may or may not require advisory councils for local educational agencies. Where such councils are mandated, the statute generally provides only minimal guidance for operation of local councils.

The educational legislation which the Office of Education administers for elementary and secondary education, including vocational and handicapped, requires five State advisory councils. In addition to the five required by statute, there is another which is permissive. An additional four have been required by regulations. For our higher education programs, two State advisory councils are required. The five required elementary and secondary State councils are for the following programs: Vocational Education, the National Reading Improvement Program, the Elementary and Secondary Education Act, Title IV, Consolidated program, Education For All Handicapped Children Act, and the Library Services and Construction Act. The one permissive State advisory council is authorized in the Adult Education Act. The four State advisory councils required by regulation are in the Career Education, Arts Education, Emergency School

Aid Act program, and the Title I Migrant Education program. Under the Emergency School Aid Act in the special programs and projects portion there may be an advisory council created for each specific program. The Higher Education programs which would call for State Advisory involvement are Title I, the Community Services and Continuing Education Program, and the Postsecondary Education Commission established under Section 1202 of the Higher Education Act.

Seven of the elementary-secondary programs administered by the Office of Education include statutory provision for local advisory councils and two additional programs have required such councils through the regulatory process. The seven programs requiring councils are: Teacher Corps, Vocational Education, the Special Programs and Projects under the Emergency School Aid Act, the Indian Education Act, the Bilingual Education Act, Title I of the Elementary and Secondary Education Act, and the Ethnic Heritage program. The two programs which have required local councils or advisory groups, through the regulatory process, are the Arts Education Program and the Follow Through Program.

In most instances, the local councils function to provide advice and consultation in the development and implementation of a project which is funded under the specified authority. Also I should add that not all of the bodies referred to as local councils may be precisely filling the role of an advisory body. I am confident there is considerable variation among the local educational agencies across the nation as to procedures followed in establishing, relating to, and using the councils. As you know, the legislation creating a local council for the Teacher

Corps calls for an election. Chances are that elected local councils are likely to expect commensurate responsibility and authority.

State councils are generally delegated the responsibility of advising the top policymaking authority in the State usually the State board of education on the development of policy matters related to the federally mandated program. They also provided advice and consultation on the development and implementation of a State Plan if one is called for. Oversight functions are usually specifically mentioned or implied as an additional responsibility of State level councils. This would mean that the State councils would periodically review the plan and administrative implementation of the program in the State educational agency. They are also usually charged with reporting annually to the U.S. Commissioner of Education on the overall status of the program in their respective States. The State councils for Vocational education, Title IV-ESEA and the Advisory Panel for the Handicapped are examples. Funding for State advisory councils is usually allowable under the regulations to be provided from the State's administrative entitlement. The exception is that the State advisory council for Vocational Education has a separate authorization of $8,000,000 for Fiscal Year 1978 increasing to $10,000,000 for Fiscal Year 1981 and then dropping back to $8,000,000 for Fiscal Year 1982.

The functions of local advisory councils primarily involve providing advice to the local educational agency concerning the implementation and operation of the project approved and funded by the State educational

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agency under the specified program or in the case of project grant programs the projects would be funded directly by the U.S. Commissioner of Education. Funding provisions for local advisory councils have not to date been made explicit in the law or regulations. We are advised that States in their administrative roles have, in most instances, allowed the necessary expenditures of local advisory councils to be covered under the terms and conditions of the grant made by the State to the local educational agency. In the case of projected funded by the Commissioner provisions are usually made to pay the essential costs for a required advisory body from the project grant.

Program officials throughout the Office of Education generally agree that State and local advisory councils and panels are assets to their programs. Our program managers indicate that these groups provide specific advice and consideration for an identifiable group of students which might not otherwise receive such attention. Also advisory groups may serve to focus the attention of local and State policymakers on the needs of special groups of students. Generally speaking, the educational establishment outside of the Office of Education is not so enthusiastic about State and local advisory councils. They generally take the view that the governance provisions for educational policymaking are mandated by State laws and by local regulations, and such provisions are adequate to represent all students regardless of their status or condition of educational needs. Therefore, externally mandated councils and advisory bodies tend to interfere with normal procedures of conducting their business. Consequently, the support for federally mandated State and local advisory councils from the educational establishment is not overwhelming. An additional factor which should be considered in federally mandating State and local councils is whether or not the State may already have advisory channels in operation in behalf of specific groups of students or in terms of specific needs of students. State legislatures have also adopted a fairly widespread practice of creating advisory bodies along with their educational laws. Also in many instances, local boards of education have voluntarily created additional panels of parents, citizens, and community leaders to study various aspects of the educational process and report to them their recommendations and findings. Unfortunately, we do not have the kind of data available to indicate the extent of such activities, and I am not certain that we want to add to the paperwork burden in an effort to find out.

Federal legislation which creates State and local advisory councils for educational purposes is subject to a variety of interpretations. Given the time honored principle of State and local control of the educational process it is difficult to adequately rationalize a heavy Federal hand in creating advisory councils for the State and local levels. Particularly, the State level councils are frequently viewed as an alternative or competing State Board of Education. The local councils, with perhaps the exception of the one created in the Indian Education Act, are not generally viewed as a threat to the existing authority of the local board of education; rather, they are more inclined to focus their attention on the specifics of a single process and not become extensively involved in broad policy issues going beyond a single program.

I think it is important to emphasize at least from my perspective of viewing legislation developed over the years, that the local advisory councils, which are primarily parent councils, were created to gain a greater participation from parents of disadvantaged and minority groups which had traditionally not been extensively involved, if not excluded, from local school affairs. These councils have obviously had varying successes, but I have witnessed great enthusiasm by those involved.

Since a number of our programs serving the disadvantaged require or use such councils, one could find in a single school district perhaps, as many as three or four separate Federally required or authorized councils which are dealing in related areas. While this might be viewed as overlapping, any effort at consolidation into a single broad-based multiple interest advisory council should be weighed carefully. Such a council could be viewed as competitive with local school boards and an undue intrusion in local affairs. It could also dilute and diminish the parental participation benefits now provided.

In view of these and similar factors, and in conclusion, our recommendations would be to proceed cautiously and carefully in requiring State and local educational agencies to establish advisory councils and related groups. Too much advice and counsel may result in a creeping malignancy of overlapping and confusing advice which brings on a paralysis in effective educational policymaking. However, at the same time comprehensive well conceived advice and counsel is an absolute necessity in operating a quality education program.

Dr. ALFORD. Turning first to the National Advisory Councils, I would note that in my testimony I have provided a list as table 1 of the 17 existing national advisory councils. One of these will go out of existence on September 30, that is the handicapped, which was not continued by the Congress. We will be down to the number of 16 by October 1 of this year.

Table 2 in my testimony provides general information about the national advisory councils, their number of meetings, staffing, costs, and so forth. This is a table prepared for the GSA report each year. You may find that useful as far as summary information is concerned.

I would note that the Office of Education, as far as their national advisory council is concerned, has gone from a high of something around 26 such councils in 1969 down to the current 16 as of

October 1 of this year. This has been through a gradual process of nonrenewal on the part of Congress and termination on the part of the Commissioner through the authority that he has under the General Education Provisions Act which allows him to recommend the termination, or merger of committees, and if the Congress has not vetoed this action it becomes effective.

Last year, for example, in 1976 the Commissioner abolished two councils via this route, the Advisory Committee on Bilingual Education and the National Council on Quality in Education.

It is also to be noted that the Congress within the past 10 months has terminated two national advisory councils by nonrenewal of their authority. One of these, the National Advisory Council on Education Professions Development, and the other the aforementioned National Advisory Committee on the Handicapped.

We do undertake each year a comprehensive review of national advisory councils. This has been required since 1972 by the Federal Advisory Committee Act of that year. The review took on a special significance this year because President Carter in his message of February 25 indicated that we were to look at this from a zero base point of view.

The Office of Education did develop a proposal and this proposal has been submitted to OMB. There has been no final action on it, but the information is public, and I thought I would at this point use that as a summary of our current position relative to the national advisory councils.

The office would continue in its recommendations four of the existing councils. These are councils which serve very special need areas and deal with minority groups or are an integral part of program administration. These four are: the National Advisory Council on Indian Education, National Advisory Council on Women's Educational Programs, Accreditation and Institutional Eligibility Advisory Committee, and the National Advisory Committee on Higher Education and Black Colleges and Universities.

We have recommended two councils for termination. One of them is the Council on Environmental Education , and the other is the National Advisory Committee on the Handicapped, which is already in effect terminated by congressional action.

We would also then propose the merger of the remaining 11 councils into 5 broad-based councils which would advise the new progrm bureaus and the commissioner.

Just indicating these groupings, we would have the Council for Education and Work, a Council for Elementary and Secondary Education, a Council on Student Financial Assistance, and one on Higher and Continuing Education. We would have grouped within thse four councils appropriate existing national advisory councils or their functions in a new format.

Then we would recommend a fifth National Advisory Council on Special Programs, which would sort of cover everything else, pick up those programs not now under our normal bureau structure. Two bureau structures are not covered by this kind of a proposal. One of these is the Office of Indian Education, which has a council which we are recommending for continuation and that would serve that bureau.

In the case of the Bureau of Education of the Handicapped, we would expect that they would receive advice from one of the established bureaus within the department which touch on the area of handicapped. We do not know what the final recommendation of the President will be in this area, but we do feel that as a result of his message that certainly he is going to make recommendations for substantial reductions in this area. The President used the term "compelling need" in his memorandum concerning the justification of retaining statutory councils or committees.

Now the Congress is not under any such restriction in establishing or retaining these organizations, that is of using "compelling need," but it may be appropriate to examine more closely in the future whether advisory councils are really needed for most programs. National advisory councils in the past have been appointed to serve a number of roles by legislative mandate: one, to advise the commissioner, secretary, President and the Congress in newly emerging areas where a broad nonbureaucratic view may be needed; two, to advise and sometimes even help to develop program regulations and guidelines and to set priorities; three, to make legislative recommendations for modifications, and four, to oversee the grant approval process and in some cases having to certify awards.

In addition, a number of councils might be described as having developed into an advocacy group for the interests served and a lobbying force for program retention. These are not normally legislative mandates. In recent years a number of conditions have changed which we believe modifies the need for national advisory councils.

First, the Federal education programs are fairly well-established and we are not moving as extensively into new and perhaps uncharted areas as was true a decade or more ago.

Second, the Congress itself in its expanded oversight and legislative role provides very effective advice on a periodic basis, advice, I might add, with a bite.

Third, the Congress has provided the department with adequate authority to appoint ad hoc committees or councils to provide specific advice and counsel when special need for expertise or outside review becomes necessary. These short-term councils and committees have the advantage of providing fresh, current advice.

With the new open approach by the executive branch to the development of legislative proposals and regulations involving large segments of the public, another function which in the past was fulfilled by advisory councils may be to a large extent superseded. While national advisory councils may still play an important role, particularly as we on occasion move into new critical areas, we believe that it is an instrument which needs redesign in the light of changing conditions, and a more cautious use.

I would now like to turn to the State and local advisory councils, and I would indicate to you here that we do not have as much statistical hard data on these, in their actual use, as we would like. I think this is the first time we have really had an overview hearing in this area. I have included some information and comments in the testimony on these advisory councils.

I do have a table which we prepared on the State advisory councils which I can provide you for the record, on the mandated ones, which may be of some use to you there.

Mr. Mottl. That will be submitted into the record.

[The table referred to by Albert Alford follows:]

FEDERALLY REQUIRED STATE ADVISORY COUNCIL SUMMARY

Program	Statutory Citation	Regulation Citation	Membership Defined	Functions	Funding	How Appointed	Miscellaneous
Vocational Education "State Advisory Council"	Sec. 105-Title II P.L. 94-482	In Regulations approval process	Twenty required categories	.Advise State Board .Evaluate Vocational programs .Submit to Commissioner an annual evaluation report .Assess needs for programs .Staff independently	FY 78-$8 million FY 79-$8.5 million FY 80-$9 million FY 81-$10 million FY 82-$8 million	Governor, or if State Board is elected by Board	This Council becomes operative on Oct. 1, 1977. The existing State Advisory Council was authorized by the Vocational Education Act of 1968.
Education of the Handicapped Act-"Advisory Panel"	Sec. 613(a)(12) of P.L. 94-142	Now in final clearance process Sec. 121.650 and following	Seven categories of members required	.Advises State educational agency of unmet needs .Comments publicly on proposed State rules and regulations .Assists the State in making any evaluations or providing information which may assist the Commissioner in the performance of his responsibilities under the Act.	No statutory provions - Regulations will state that the State may pay for essential services for the panel from its entitlement	By Governor or other official authorized by State law to make such appointments	If the State has an advisory panel appointed by the Governor or any other official authorized under State law to make such appointments which fulfill the Federal requirements then a new council is not required.

STATE COUNCILS CONTINUED

Program	Statutory Citation	Regulation Citation	Membership Defined	Functions	Funding	How Appointed	Miscellaneous
Title IV-ESEA Consolidated	Title IV, Sec. 403(a)	Title 45, Part C, Sec. 134.50	Twelve categories of persons from which members are chosen Must be broadly representative of the cultural and educational resources of the State	.Advise State educational agency on policy matters arising from administration of the program .Annual report to OE .Meets within 30 days after certification for annual planning to include not less than one public meeting per year .Evaluate all programs and projects funded under the program	Commissioner allocates funds for Council staffing and other functions from funds made available under the program to the State for administration	State educational agency or as otherwise provided by State law	This Council was established by the Education Amendments of 1974 but there was a Title III Council prior to that time.
Adult Education Act State Advisory Council (Permissive)	Sec. 310A(a)(b) P.L. 93-380		Includes persons who by reason of experience or training are knowledgeable in the field of adult education or are members of State or local educational agencies	.Advise the State educational agency of the policy matters arising in the administration of the State Plan .Advise on long range policy plans for adult education .Evaluate adult education programs .Submit an annual report through the State to the Commissioner	Necessary expenses of Councils may be paid from State administrative allotment of 5% of its entitlement	Governor or in a State where members of the State board are elected the board may appoint the advisory council	Twenty-nine States have Advisory Councils on Adult Education

STATE COUNCILS CONTINUED

Program	Statutory Citation	Regulation Citation	Membership Defined	Functions	Funding	How Appointed	Miscellaneous
The Library Services and Construction Act "State Advisory Council on Libraries" (Enacted in 1970)	Sec. 6(a)(3)	Sec. 130.8 Title 45 CFR	Broadly representative of public, school, academic, special and institutional libraries and libraries serving the handicapped and persons using such libraries including the disadvantaged	.Advise State library administrative agency on the development of and policy matters arising in the administration of State Plan .Assist State library administrative agencies in the evaluation of activities funded under the Act	Councils may be supported with resources from State's entitlement (necessary expenditures authorized only)	Various methods used in separate States	
The Migrant Education Program (Title I-ESEA)	Sec. 122, Title I, ESEA (No council is specifically authorized except the Commissioner must require applicant SEA's to comply with provisions of the Title I program which demand a school ans school system advisory council		Regulations require membership to include parents of migrant students	Regulations require that Councils provide consultation and advice on carrying out all aspects of a State migrant education project or plan	Necessary expenses of Council may be paid by grant funds	State Educational Agency	This Council was established by Regulation to parallel the Parent Advisory Council for regular Title I projects. Since the State is the applicant agency in the Migrant Education Program this Council is classified as a State Council; however, it may be considered as being comparable to the Title I local councils.

STATE COUNCILS CONTINUED

Program	Statutory Citation	Regulation Citation	Membership Defined	Functions	Funding	How Appointed	Miscellaneous
Right-to-Read Reading	Reading Improvement Act, Sec. 705(d)(1) Title VII of P.L. 93-380	CFR Title 45 Sec. 151.41 (b)(4)	.Representatives of public and private nonprofit elementary and secondary schools .Institutions of higher education .Parents of elementary and secondary schools .Professionals in reading competencies	Designates priorities for projects from LEAs in State	Commissioner may allow for costs of advisory council as a part of State's allotment	State Educational Agency	

Regulations for three additional programs require State advisory councils where appropriate.

The three programs are:

1. Career Education
2. Arts Education
3. Emergency School Aid Act

The regulations for the Emergency School Aid Act in §185.75 and 185.91 call for advisory councils which may be State wide, regional, or multi-state.

Dr. Alford. Under existing programs there are some 10 State advisory councils for elementary and secondary education. These councils are in vocational education, national reading improvement program, Elementary and Secondary Education Act, Title IV consolidation, Education for All Handicapped Children Act, the Library Services and Construction Act, and adult education, career education, arts education, Emergency School Aid Act, and also Title I of the migrant education program. That one is a little different in that it really is related to local advisory councils, but in many cases the applicant is the States; in the migrant program it in effect becomes a State council.

In higher education we really only have two such councils, one of them is really program-related—both of them are, but one is broader than the other. Title I of the continuing services and education program is related to a specific program, the Post Secondary Education Commission under 1202 has a broader mandate but also related to the old facilities program where this still exists.

There are nine programs involving local committees.

Seven of the elementary-secondary programs administered by the Office of Education include statutory provision for local advisory councils and two additional programs have required such councils through the regulatory process. The seven programs requiring councils are: Teacher Corps, Vocational Education, the Special Programs and Projects under the Emergency School Aid Act, the Indian Education Act, the Bilingual Education Act, Title I of the Elementary and Secondary Education Act, and the Ethnic Heritage program.

The two programs which have required local councils or advisory groups, through the regulatory process, are the Arts Education Program and Follow-Through Program.

As I say, we would like to have more information if we could about the operation of these councils, but I can just give some sort of general conclusions that we have relative to the State and local councils. Program officials throughout the Office of Education generally agree that State and local advisory councils and panels are assets to their programs.

Our program managers indicate that these groups provide specific advice and consideration for an identifiable group of students which might not otherwise receive such attention. Also, advisory groups may serve to focus the attention of local and State policy-makers on the needs of special groups of students.

Generally speaking, the educational establishment outside the Office of Education is not so enthusiastic about State and local advisory councils. They generally take the view that the governance provisions for educational policy-making are mandated by State laws and by local regulations, and such provisions are adequate to represent all students regardless of their status or condition of educational needs. Therefore, externally mandated councils and advisory bodies tend to interfere with normal procedures of conducting their business. Consequently, the support for federally-mandated State and local advisory councils from the educational establishment is not overwhelming.

An additional factor which should be considered in federally-mandating State and local councils is whether or not the State may already have advisory channels in operation in behalf of specific groups of students or in terms of specific needs of students. State legislatures have also adopted a fairly widespread practice of creating advisory bodies along with their educational laws. Also, in many instances, local boards of education have voluntarily created additional panels of parents, citizens, and community leaders to study various aspects of the educational process and report to them their recommendations and findings.

Unfortunately, we do not have the kind of data available to indicate the extent of such activities, and I am not certain that we want to add to the paperwork burden in an effort to find out.

Federal legislation which creates State and local advisory councils for educational purposes is subject to a variety of interpretations. Given the time-honored principle of State and local control of the educational process, it is difficult to adequately rationalize a heavy Federal hand in creating advisory councils for the State and local levels. Particularly, the State level councils are frequently viewed as an alternative to or competing with State Boards of Education. The local councils, with perhaps the exception of the one created in the Indian Education Act, are not generally viewed as a threat to the existing authority of the local board of education; rather, they are more inclined to focus their attention on the specifics of a single process and not become extensively involved in broad policy issue going beyond a single program.

I think it is important to emphasize, at least from my perspective of viewing legislation developed over the years, that the local advisory councils, which are primarily parent councils, were created to gain a greater participation from parents of disadvantged and minority groups which had traditionally not been extensively involved, if not excluded, from local school affairs. These councils have obviously had varying successes, but I have personally witnessed great enthusiasm by those involved.

Since a number of our programs serving the disadvantaged require or use such councils, one could find in a single school district perhaps as many as three or four separate federally-required or authorized councils which are dealing in related areas. While this might be viewed as overlapping, any effort at consolidation into a single broad-based multiple interest advisory council should be weighed carefully. Such a council could be viewed as competitive with local school boards and an undue intrusion in local affairs. It could also dilute and diminish the parental participation benefits now provided.

In view of these and similar factors, and in conclusion, our recommendations would be to proceed cautiously and carefully in requiring State and local educational agencies to establish advisory councils and related groups. Too much advice and counsel may result in a creeping malignancy of overlapping and confusing advice which brings on a paralysis in effective educational policy-making. However, at the same time, comprehensive, well-conceived advice and counsel is an absolute necessity in operating a quality education program.

Mr. MOTTL. Thank you very much, Dr. Alford.

Now we will proceed with the panel. The first witness that we have listed on our schedule is Mr. Gary Eyre, the Executive Director, representing the chairman of the council, Dr. Alton Crews, National Advisory Council on Adult Education.

Dr. **EYRE**. Thank you, Mr. Mottl, Mr. Kildee.

My name is Gary Eyre and I am the Executive Director of the Adult Education Council. I have been asked by the National Advisory Council on Adult Education and its chairman Dr. Alton C. Crews, the Superintendent of Schools of Charleston, South Carolina, to represent the council and to present our written testimony, which you have, regarding the functions and activities of the National Advisory Council.

[Prepared statement of the National Advisory Council on Adult Education; submitted by Dr. Alton Crews follows:]

NATIONAL ADVISORY COUNCIL ON ADULT EDUCATION

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
Committee on Education and Labor

House Subcommittee on
Elementary, Secondary, and Vocational Education
Carl D. Perkins, Chairman

TESTIMONY

on the
National Advisory Council on Adult Education
Dr. Alton C. Crews, Council Chairman
August 4, 1977

NACAE
NATIONAL ADVISORY COUNCIL on ADULT EDUCATION

The National Advisory Council on Adult Education serves a unique population in America in unique ways.

We know there are some 55 million Americans over 16 years of age with less than a high school education in the United States today. U.S. Office of Education research indicates some 25 million of these adults are functionally incompetent (that is, they do not have the day-to-day skills to adequately function in society). They are voiceless, unorganized and disillusioned. They have been temporarily lost to American public education. Their total life focus is survival. It is this population that the Council serves and represents.

The National Advisory on Adult Education has been and is guided by a simple premise - that popular democracy and education in the United States are inseparable. Liberty and equality for every human being -- without regard to age, race, color, creed or sex -- are touchstones of popular democracy, in social, economic and political terms. Yet the population which I have described -- that population which the Council represents -- has achieved neither liberty nor equality -- for educational opportunity truly provides access to avenues leading to social, economic, and political freedom.

In accord with valid educational theory, the Council's work assumes that universal education requires the learner's meaningful' participation and involvement. Indeed, only through actual participation in a process can education take place. Thus, to learn to live with political freedom as competent and responsible citizens, the populace must actually participate in the functioning of government.

The National Advisory Council on Adult Education, given its ultimate concern for popular democracy, serves two functions. First, it seeks to remedy educational disadvantage through the improvement and expansion of opportunity for adult education. Second, it seeks to support and motivate professionals in adult education to accept the challenge of providing "a new beginning" for adults, guaranteeing to each adult the right to develop requisite skills to become better workers, better parents and homemakers, better users of leisure time. Adult education is also challenged to provide programs that enable adults to make successful adjustments to aging and acquire the basic competencies attending that adjustment.

The Council in its role as a liaison between the Federal government and the public, engages in an ongoing dialogue, not only with the Executive and Legislative Branches and the U.S. Office of Education but with myriad adult education agencies, institutions and organizations at the state, regional, and national level, private, voluntary organizations, other advisory groups, adult education practitioners, business and industry, and concerned private citizens.

Since its inception in 1971, the Council has been the representative voice of a voiceless population. The Council has provided a listening post, and a mechanism for this population, and the teachers and administrators who reach and teach them, to communicate with the Administration and the Congress. The results of Council dialogue with potential students, students, adult education teachers, administrators and the public have been highly productive. The Council has provided:

- an examination and critique of teacher training in adult education
- a synopsis of Federal adult education laws/activities
- the compilation of a "glossary" of national adult education associations and voluntary organizations
- a position paper on Parent/Early Childhood Education
- a status report on State adult education advisory councils
- conducted national hearings on Federal Adult Education Act Amendments and Futures.

These have caused the identification of several funding and program problems requiring the attention of and action by the Executive and Legislative Branches.

In fulfilling its obligation to make recommendations to the President, the Congress and DHEW/USOE, the Council has also contributed to the shaping of national policy and legislation. Growing out of such recommendations have been -

- the first steps toward consolidation of all Federal adult education services under one agency;
- the development of career-oriented education for adults;
- the development of career counseling programs for adults;
- the expansion of adult education programs in correctional institutions;
- the growth of education programs for senior citizens.

In 1973, for example, when the Adult Education Act was due to expire, the Council's recommendations were instrumental in the passage of an expanded and more comprehensive Adult Education Act, including funding for programs and support services among American Indians and institutionalized persons; broader programming for the educationally disadvantaged;

and the design and implementation of career education models.

The Education Amendments of 1974 also reflect many of the Council's recommendations. The content of state plans was broadened to provide experimental, demonstration and teacher-training projects; state advisory councils on adult education were suggested; a clearinghouse on adult education was authorized, and the composition of the Council was revised to assure the participation of persons with special knowledge and experience in educating adults with limited facility in the English language.

Resource materials, of value to the Executive and Legislative Branches and to education administrators in state and local government, have been another by-product of Council activity. The 1975 report to the President titled, "A Target Population in Adult Education" brought into focus the special educational needs of the nation's adult population. Four additional publications have since been disseminated.

Last year, in its Annual Report, the Council noted that:

> Adult Education, like every other social institution in America, has responded to the forces of change by growing bigger: more programs, more staff, more classes, more variety, more people served.

This is true -- but we must also note that the problems of surviving in our society in America today do not become less complex. The educational needs of the population have also responded to the forces of change by growing bigger. And as society becomes more complex and educational needs grow, the needs of the functionally illiterate and illiterate segments of our population become overwhelming.

The Council, through this period of change and growth, has provided critically needed continuity of objective communication between the

Federal government and the public. This need will not diminish in the foreseeable future as the needs of the population we serve are only now, moving into our third century, beginning to be met.

The Council's 1977 (Section I) Report, transmitted to Congress in May, provides additional background information concerning the Council.

In October 1977, a Section II Report will be presented to the President and Congress which will contain statistical information on a state by state basis relating to the partnership in adult education between local education agencies, the States and the Federal government.

The Duties and Responsibilities of the National Advisory Council on Adult Education

Section 311 of the Adult Education Act (P.L. 91-230 as amended) establishes the Council and the membership appointment authority of the President of the United States.

The law requires the Council to:

1. Advise Congress and the President on the administration and effectiveness of programs under the title, make recommendations, complete annual reports of findings, and include recommendations for changes in the Act and other Federal laws relating to adult education activities and services.
2. Advise the Assistant Secretary for Education (HEW) and U.S. Commissioner of Education (USOE) in the preparation of general regulations, and advise on policy matters in the administration of the Adult Education Act.
3. Advise HEW/USOE on policies and procedures governing the approval of State plans and effectuate the coordination of programs under the Act and other programs offering adult education activities and services.

The Adult Education Act

Statement of Purpose:

Sec. 302. It is the purpose of this title to expand educational opportunity and encourage the establishment of programs of adult public education that will enable all adults to continue their education to at least the level of completion of secondary school and make available the means to secure training that will enable them to become more employable, productive, and responsible citizens.

Council Accomplishments

(FY-76-77)

Near the beginning of the Council's activities for the fiscal year 1976-1977, a statement of mission was developed that sought to delineate those purposes and priorities the Council would pursue. That statement committed NACAE as follows:

Purpose:

The National Advisory Council on Adult Education will:

- Address adult education issues from the standpoint of client advocacy.
- Lend our efforts toward making adult education a national priority.
- React to current and proposed legislation which has ramifications for adult education.
- Continue to evaluate the policies and directions of the Council.
- Review the administration and effectiveness of programs under the Adult Education Act, make annual reports to the President concerning findings, recommendations and policies which relate to adult education activities and services, in compliance with Section 311(d) of the Adult Education Act.

Priorities:

The National Advisory Council on Adult Education seeks:

- To develop a position paper on lifelong learning, including an examination of thrusts in community education and delivery systems in adult education that deliver more than basic education.
- To initiate dialogue with the Department of Labor, Comprehensive Employment Training Act (CETA) officials, and ACTION Volunteers to determine where their efforts and those of adult education can better be coordinated.
- To survey and analyze how the roles and policies of the various levels of government including state legislation and state/local expenditures affect adult education services at the state level.
- To provide for the inclusion of representatives from business, industry and the military in Council meetings.
- To identify policy issues which affect bilingual adult education, and to advise the President and Congress on future policies affecting bilingual education and adults.

- To ensure that adult education programs meet the special needs of handicapped adults.
- To encourage and support adult education programs which assist various members of the family unit to understand more fully their educational roles in the lives of children within that unit.
- To establish a working relationship with the National Advisory Council on Indian Education and the Bureau of Indian Affairs in order to better understand the problems and concerns that have impact on Indian adult education programs.
- To encourage the National Institute of Education to continue to support adult education efforts and inform the profession and the Council of its activities.
- To involve more fully in Council activities persons of diverse backgrounds and cultures.
- To enlist the cooperation of communications media in providing the public with information about adult education.
- To continue to support international adult education activities which relate to the legislative mandate and the mission of the Council.
- To encourage and support adult education opportunities for older Americans.

Although not all of its aims have been brought to full fruition, some measure of the Council's faithfulness to its mission may be inferred from a summary of the year's highlights:

Council Accomplishments:

- Conducted a comprehensive national survey of state support of adult education including analysis of existing state constitutional provisions, legislation, funding patterns and program growth since 1967.
- Conducted a series of nine regional "Futures & Amendments" meetings for the purpose of obtaining data from the field pertaining to future legislation and in order that the Council's recommendations for improving the existing Adult Education Act might be more broadly representative. (Presented to House Committee on Education and Labor, July 12, 1977.)
- In concert with White House staff, arranged a "Tuesday at the White House" meeting on adult education. This session, in May 1976, brought together leaders in the fields of education, business, industry and government, to discuss with White House representatives, the Secretary of Health, Education, and Welfare, and the Council major issues and concerns in adult learning.

- Published a Record of House-Senate Education Funding.
- Developed and reacted to HEW/USOE proposed rules and regulations having impact on adult learners.
- Published a History of Adult Education Legislation.
- Published an Annual Report to the President and Congress.
- Adopted a Council Affirmative Action Plan.
- Adopted a UNESCO Resolution supporting Adult Education.
- Initiated a working relationship with the Organization of American States.
- Made recommendations relating to concepts for lifelong learning to be incorporated into the Wingspread Conference.
- Presented testimony on the Adult Education Act (House and Senate.)

A further explanation of the survey of state support for adult education and the futures and amendments meeting is contained on the following three pages.

Futures and Amendments Meetings

The legislative mandate of the National Advisory Council on Adult Education includes making recommendations to the President for changes in the Adult Education Act and other Federal laws relating to adult education activities and services. In the process of formulating its recommendations, the Council tries to obtain input from the broadest possible spectrum of adult education practitioners, researchers, administrators and students. Information from these sources constitutes an invaluable data base, integral to the formulation of valid recommendations for Federal laws and policy.

Anticipating the imminent expiration of the present Adult Education Act and desirous of making comprehensively informed recommendations for new laws and/or amendments, the Council in early 1976 determined to gather data from all sections of the nation from the most knowledgeable participants associated with adult education. To accomplish that goal, the Council decided that a series of public meetings would be the mechanism employed for collecting two distinct types of data:

Amendments Meetings
Meetings in this category were designed to bring people together to discuss possible changes in the existing Adult Education Act in order that

—the delivery of services

—administrative efficiency and economy

—operational impact of programs, and

—the return on investments of Federal and state funds in adult education programs might be improved.

Futures Meetings
Meetings were designed to bring people together to discuss their visions and dreams—their concepts of what, ideally, the status, programs and results of adult learning in America should be ten or more years hence; and the perceptions of the role the Federal government might best play in the attainment of these ideals was also to be discussed.

These meetings would come to be called "Futures & Amendments" meetings.

The meetings were structured to permit the two sections—one on Amendments, one on Futures—to be convened concurrently in a designated region. Each meeting was scheduled to allow one and a half days of intense dialogue. Approximately 20 persons were invited to participate in each section. However, overall attendance at the meetings averaged nearly 50 participants because former Council members residing in the region along with program officers from regional U.S. Offices of Education would also attend.

Invitations to the regional meetings were based on recommendations from chief state school officers from the states and state directors of adult education (who, themselves, were invited). Diligent effort was expended on assembling persons who might best represent their states in one of the sections. Mainly, the participants were persons with a wide range of experience in business, industry, labor, state and muncipal government as well as adult education professionals and others knowledgeable in the field of adult learning. Serving as facilitators for the meetings were the Council Chairman, Council members from the region and personnel from the Council office.

Data Base

In general the Futures & Amendments Meetings sought answers to such questions as:

- What role should the Federal government play in support of adult education programs? In support of adult education research?
- What changes could and/or should be made in the existing legislation to
  - —increase administrative efficiency
  - —facilitate increased state support of and commitment to adult education
  - —improve the delivery of adult education programs/services
  - —facilitate increased administrator/teacher competencies?
- What types of coordination and cooperative partnership activities between the Federal, state and municipal agencies might be facilitated by the Federal government?
- What types of new legislation should be developed? To reach what objectives?

Between April 22, 1976, and March 22, 1977, eight Futures & Amendments Meetings were held. Meetings scheduled for 1976-1977 were held on the dates and in the regions shown below:

April 22-23, 1976
Washington, District of Columbia
May 3-4, 1976
Washington, District of Columbia
September 13-14, 1976
Indianapolis, Indiana
September 16-17, 1976
Denver, Colorado
October 27-28, 1976
Boston, Massachusetts
November 29-30, 1976
San Francisco, California
December 6-7, 1976
Houston, Texas
March 21-22, 1977
Washington, District of Columbia

The final meeting with a national rather than regional emphasis was conducted in Kansas City, Missouri, on May 22-24, 1977.

Survey of State Support of Adult Education

During the summer of 1976, in preparation for the development of recommendations concerning new or modified Federal adult education legislation, the Council contacted various national education agencies and organizations. Essentially, these contacts were intended to determine the availability of information on state financial support for adult education, state constitutional provisions, statutes and school codes which impact on adult learners, and the organizational structures of state education agencies.

It soon became apparent that data in the form needed by the Council to assist in the development of legislative recommendations had not been compiled. Thus on August 16, 1976, at the Council's meeting in Des Moines, Iowa, a "Prospectus for a Survey of State Support of Adult Education" was discussed and the implementation of a survey approved. (For the purpose of this survey, adult education has been defined as any planned/structured learning experience for persons aged sixteen or over who do not have a certificate of graduation from a school providing secondary education, who have not achieved at least that level of education, and are not required to be in school.) The study, undertaken by the staff of the Council, has yielded information on the status of support for adult education in every state. It also has permitted the identification of possible trends of state commitment in relation to the application of Federal funds for adult education.

Since September 1976 each state agency responsible for administering the adult education/state grant program has completed the Council's special survey instrument. Among topic areas targeted in the survey were:

—Organizational Structure of State Departments of Education

—Constitutional Provisions for Adult Education

—State Adult Education Legislation and Policy

—State Adult Education Descriptors

—Financial Information

—Economic Indicators

Details, an analysis, graphic materials and recommendations derived from the survey appear in Section II.

National Advisory Council on Adult Education

Meeting Dates, Sites, and Agenda Topics

October 1-2, 1976
Arlington, Virginia

- Adult Indochinese Refugee Programs
- Adult Education Clearinghouse
- Lifelong Learning Conferences
- Executive Directors' Workshop—White House
- State Program Plans, FY-77
- Management Evaluation Review for Compliance
- International Council for Adult Education
- UNESCO Draft Recommendation
- Competency Based Adult Education—Adult Competency Test (ACT)
- Orientation Procedures
- HEW Reaction to 1976 Annual Report

November 17-18, 1976
New York, New York

- National Conference/Adult Education Association (AEA/USA) — National Association for Public Continuing and Adult Education (NAPCAE)
- HEW Secretarial Rules and Regulations
- Psychological and Social Needs of the Adult Student
- State Directors' Meeting
- Urban Administrators' Meeting
- American College Testing APL Meeting
- 1977 Council Report
- Policy and Action Imperatives for Lifelong Learning
- Coordination Activities with Administration on Aging
- Adult Education Lifelong Learning (ADELL)/Educational Resources Information Center (ERIC) Clearinghouse
- Program Visitation Reports

January 24-26, 1977
Washington, D.C.

- Orientation/Oath of Office Ceremonies—New Members
- Council Priorities and Committee Assignments
- Federal Supplemental Appropriations
- National Right to Read and Reading Academy Program
- Association Legislative Thrusts
- Committee on Full Funding for Education Programs
- The Presidential Education Budgets
- President Carter Appointments—Education
- Higher Education Act
- Office of Management and Budget (OMB) Clearinghouse on 311(d) Evaluation Project
- Adult Education Promotional Materials

National Advisory Council on Adult Education

Meeting Dates, Sites, and Agenda Topics

April 4-5, 1977
Phoenix, Arizona

- National ABE Commission Conference
- Indian Education Issues
- Renewal Evaluation Report
- Adult Education Terminology Project—National Center for Education Statistics (NCES)
- Regional Program Officer's Report
- National Futures and Amendments Conference
- Presidential and Secretarial Chairmen's Meeting
- Adult Education Policies and Issues Workshop
- 1977 Council Report
- White House Conference on the Handicapped

June 10-11, 1977
Charleston, South Carolina

- Election of Council officers
- Analysis of Futures and Amendments Findings
- Coordination with other Department Education Thrusts
- Lifelong Learning
- State Survey
- Education Advisory Council Chairmen's meeting
- Regional Adult Education Conference

National Advisory Council on Adult Education

Budget - FY-77 ($270,700.00)

Administrative Staff (3½) (Admin. Ass't; 2 Secretaries; 1 part-time clerical student)	$ 45,646.62
Professional Staff (2) (Executive Director; Assistant Director)	79,531.23
Council Members' Compensation (15 members)	
Full Council Meetings (5)	12,400.00
Committee Meetings (8)	5,600.00
On Site Visitations (37)	7,700.00
Other Council Business (officers)	4,500.00
Contract Consultants	3,596.00
Personnel Benefits	
Council Members and Staff	13,272.39
Travel and Per Diem	
Full Council Meetings (5)	20,524.88
Committee Meetings (8)	5,738.28
On Site Visitations (37)	4,857.80
Other Council Business (officers)	3,927.70
Project: Futures & Amendments (9 meetings)	25,425.47
Staff	18,343.71
Taxi	958.83
Rental of Equipment	3,504.70
Telephone	18.65
Printing and Reproduction	7,152.48
Contractual Services	684.23
Services of Equipment	492.24
Office Supplies	2,582.44
Reports, Subscriptions	3,693.50
Office Furnishings	18.00
Books	530.85
Total:	$270,700.00

Full Council Meetings

FY '77

October 1-2, 1977	Arlington Virginia			
		Expenditures:	Travel and Per Diem	$2641.91
			Compensation	1700.00
				$4341.91
November 17-18, 1977	New York, New York			
		Expenditures:	Travel and Per Diem	$4608.13
			Compensation	1400.00
				$6008.13
January 24-26, 1977	Washington, D.C.			
		Expenditures:	Travel and Per Diem	$5388.02
			Compensation	4100.00
				$9488.02
April 4-5, 1977	Phoenix, Arizona			
		Expenditures:	Travel and Per Diem	$ 7969.45
			Compensation	2600.00
				$10569.45
June 10-11, 1977	Charleston, South Carolina			
		Expenditures:	Travel and Per Diem	$6642.67
			Compensation	2800.00
				$9442.67
Total				$39,850.18

National Advisory Council on Adult Education

Appropriations FY '71 - '77

1971	Budget	$125,000.00
1972	Budget	$166,000.00
1973	Budget	$206,000.00
1974	Budget	$199,000.00
1975	Budget	$200,900.00
1976	Budget	$340,000.00
1976	(Transition Quarter) Budget	$ 97,509.00
1977	Budget	$270,700.00

NACAE
NATIONAL ADVISORY COUNCIL on ADULT EDUCATION

Alton C. Crews, Chairman
Kyo R. Jhin, Vice Chairman

PRESIDENTIAL APPOINTEES

Appointed 1974

Dr. Archie L. Buffkins
The Graduate School
University of Maryland
2133B-South Administration Building
College Park, Maryland 20742
BUS: (301) 454-4749
RES: (301) 474-3541

Dr. Mary A. Grefe
3000 Grand Avenue
Apartment #917
Des Moines, Iowa 50312
RES: (515) 277-7302

Mr. Reuben T. Guenthner
Assistant State Director
State Board for Vocational Education
900 East Boulevard
Bismarck, North Dakota 58501
BUS: (701) 224-3101
RES: (701) 255-3567

Mr. Arthur L. Terrazas, Jr.
Developmental Studies Division
Aims Community College
Greeley, Colorado 80331
BUS: (303) 353-8008 Ext. 360
RES: (303) 353-1020

Mrs. Judith Nixon Turnbull
Executive Vice President, Publisher
Tuesday Publications, Inc.
625 No. Michigan Avenue
Chicago, Illinois 60611
BUS: (312) 751-1755
RES: (312) 337-4246

Appointed 1975

Dr. Donald G. Butcher
Dean, School of General Education
Ferris State College
Big Rapids, Michigan 49307
BUS: (616) 796-9971 Ext. 481
RES: (616) 796-9366

Dr. Alton C. Crews
Superintendent
Charleston County Public Schools
P.O. Box 2218
Charleston, South Carolina 29403
BUS: (803) 722-8841

Dr. Kyo R. Jhin
Executive Director
Top of Alabama Regional Education
Service Agency
711 Arcadia Circle, N.W.
Huntsville, Alabama 35801
BUS: (205) 533-5955
RES: (205) 539-6317

Dr. Marshall L. Lind
Commissioner of Education
State Department of Education
Pouch F
Alaska Office Building
Juneau, Alaska 99801
BUS: (907) 465-2800
RES: (907) 586-1081

Mr. Eugene L. Madeira
Director of Adult Education
Lancaster School District
Lancaster, Pennsylvania 17602
BUS: (717) 393-3871
RES: (717) 299-4512

Appointed 1976

Mrs. Gertrude Beckwith Calden
745 Calle De Los Amigos
Santa Barbara, California 93105
RES: (805) 678-8830

Mrs. Joan E. Kenney
2330 Abarth Street
Las Vegas, Nevada 89122
RES: (702) 452-7714

Mrs. Betty J. Mage
6901 Corregidor Road
Vancouver, Washington 98664
BUS: (206) 699-2456
RES: (206) 693-7769

Dr. Lane Murray
Superintendent
Windham School District
Texas Department of Corrections
P.O. Box 40
Huntsville, Texas 77340
BUS: (713) 295-6371 Ext. 391

Mr. John K. Wu
48 Andover Street
Ludlow, Vermont 05149
RES: (802) 228-8107

* *

Dr. Gary A. Eyre
Executive Director

Dr. Carlene L. Turman
Assistant Director

Mrs. Helen G. Banks
Administrative Assistant

July 1977

MAJORITY MEMBERS:
CARL D. PERKINS, KY., CHAIRMAN
WILLIAM D. FORD, MICH.
IKE ANDREWS, N.C.
MICHAEL BLOUIN, IOWA
PAUL SIMON, ILL.
LEO ZEFERETTI, N.Y.
RONALD MOTTL, OHIO
AUSTIN J. MURPHY, PA.
JOSEPH A. LE FANTE, N.J.
TED WEISS, N.Y.
CEC HEFTEL, HAWAII
BALTASAR CORRADA, P.R.
DALE E. KILDEE, MICH.
GEORGE MILLER, CALIF.

225-4368

MINORITY MEMBERS:
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CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
COMMITTEE ON EDUCATION AND LABOR
SUBCOMMITTEE ON ELEMENTARY, SECONDARY
AND VOCATIONAL EDUCATION
B-346C RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

RECEIVED
28 JUL 1977

July 27, 1977

COPY

Dr. Gary A. Eyre
Executive Director
National Advisory Council on
Adult Education
425 13th Street, N.W.
Pennsylvania Building, Suite 323
Washington, D.C. 20004

Dear Dr. Eyre:

The Subcommittee on Elementary, Secondary, and Vocational Education would like to invite you to testify at a hearing on national advisory councils on Thursday, August 4th at 9:30 a.m. in room 2175.

This hearing is part of our review of elementary and secondary education programs which expire at the end of fiscal year 1978. In looking at these programs, I feel it is essential that we receive testimony regarding the functions and activities of the advisory council connected with each of these programs. For that reason, I would like your prepared testimony to cover the following points as regards fiscal year 1976 (and fiscal 1977 if you believe that is also appropriate):

(1) The duties and responsibilities of your council;

(2) The budget for your council, including a breakdown of expenditures by purpose;

(3) The number of, and expenditures for, personnel;

(4) The expenditures for travel;

(5) The number of meetings annually and expenditures connected with these meetings; and

(6) The accomplishments of your council.

The rules of the Committee on Education and Labor require witnesses to submit their written testimony at least 24 hours in advance of their appearance. We would appreciate, therefore, receiving at least 50 copies of your prepared testimony by 9:30 a.m. on August 3rd. Committee rules also require witnesses to briefly summarize orally their prepared testimony.

If you have any questions, please feel free to contact the Subcommittee staff at 225-4368. I am looking forward to hearing your testimony.

Sincerely,

Carl D. Perkins
Chairman

STATEMENT OF DR. GARY A. EYRE

Dr. **Eyre**. I commend the committee for establishing this hearing on advisory councils, which are under the mandate of the ESEA legislation. The National Advisory Council on Adult Education is a strong believer, a strong believer in participatory democracy.

We believe that the advisory council mechanism is an excellent process through which problems, issues, concerns and advice can be gathered outside the bureaucracy upon which the executive and legislative branches of government can then call upon in order to procure input for educational policy direction and legislation. It is unfortunate that the executive branch and its administration since Inauguration Day over six months ago has yet to call its first meeting of representtives from presidential advisory councils.

Recently the Office of Management and Budget, Secretary Califano, initiated a review process for advisory councils. The review of the Adult Education Council and others, its role, responsiblities and functions is a well-accomplished initiative. However, the process thus far has been one of working in total isolation of the various advisory councils which the DHEW, USOE review process reportedly examined. I would hope today in our dialogue that questions are raised concerning that review process and the status of advisory councils.

The council's testimony addresses the six issues outlined in Mr. Perkins' letter of July 27. I should like, Mr. Chairman, to take a moment to highlight those parts of the advisory council's testimony, the blue document that is before the two of you and your two counselors.

Within the document you will find a section that addresses futures and amendments and a State survey. The national advisory council utilized several of its meeting dates and significant dollars to conduct eight national public hearings across this country, addressed at educators, business and industry, practitioners, teacher and students, who addressed the issue of the Adult Education Act within ESEA legislation.

Then as a conclusion to those eight national hearing sessions, a national wrap-up session was held, where futures and amendment activities to develop legislative specifications and components for a broader or modified Adult Education Act were suggested. Those have been presented to this very committee less than a month ago. That is one example of how a national advisory council can get input from people who are closest to the need.

A second part that you will find in our testimony deals with the State survey. We needed to ascertain for you, the Congress and the executive branch, the kinds of partnership programs that have emanated as a result of Federal commitment to adult education. So for the first time anywhere, including USOE's research activities, we have initiated a survey which will be presented to you folks in September, a survey that determines the constitutional provisions in every State, State legislation, the dollar commitments, the matching money, State advisory council responsibilities, and so forth.

That is outlined, Mr. Chairman and Mr. Kildee, in that testimony.

The last item I would like to touch on, a request from Chairman Perkins, deals with the council's budget. I provided for you the most recent one of 1977. I would be prepared today to break that down in percentum factors for you and to also discuss the budgetary ramifications in terms of the programmatic thrust of the National Advisory Council on Adult Education.

Once again I commend, highly commend you for taking the leadership in focusing a spotlight of review on presidential advisory councils.

Thank you very much, sir.

Mr. MOTTL. Thank you, Doctor.

Next we will hear from Dr. Wilbur Lewis, Vice Chairman, National Advisory Council on the Education of Disadvantaged Children, who is presently the Superintendent of Schools for Tucson School District in Arizona.

Dr. Lewis.

STATEMENT OF DR. WILBUR H. LEWIS

Dr. LEWIS. Thank you, Mr. Chairman.

Mr. Chairman, Congressman Kildee, I would like to first acknowledge your comments, Mr. Mottl, about my term of office in the Parma School District. I appreciate very much your kind remarks.

I am, as indicated, Wilbur H. Lewis; I am Vice Chairman of the National Advisory Council on the Education of Disadvantaged Children, Chairman of its Executive Committee, Chairman of the Ad Hoc Committee on Barrera versus Wheeler, and co-Chairman of the Committee on Indian Education and Migrant Education.

I am currently employed full-time as Superintendent of Schools in Tucson, Arizona.

I point out this personal information as an illustration of the involvement, typical of a member of the National Advisory Council on Education of Disadvantaged Children. I speak for the members of this council when I express appreciation for the opportunity to present the record of the council in summary form today. We think this is extremely important as you undertake what we believe is a much-needed review of statutory advisory councils established under the Elementary and Secondary Education Act.

[Statement of Dr. Wilbur Lewis and attachments follow:]

[Some of the supplementary materials referred to retained in subcommittee files.]

NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN
425 Thirteenth Street, N.W., Suite 1012
Washington, D.C. 20004
(202) 382-6945

August 3, 1977

Dear Congressman Perkins:

The Chairman of the National Advisory Council on the Education of Disadvantaged Children (NACEDC) has delegated Dr. Wilbur H. Lewis of Tucson, Arizona, as the representative of the Council to testify tomorrow.

The attached materials respond to your letter of invitation.

1. The duties and responsibilities of the NACEDC are located in Exhibit E, the orientation manual, and are covered in the statutory obligations, Exhibits A and B, and in the court order, Exhibit C.
2. The budget for the NACEDC, including a breakdown of expenditures by purpose is located in Exhibit H. Fiscal Information.
3. The number of, and expenditures for, personnel is located in Exhibit H.
4. The expenditures for travel are located in Exhibit H.
5. The Council meets at least twelve times yearly in full and committee sessions, and the fiscal information is located in Exhibit H. Each full Council meeting averages $3600 in travel costs and $3000 in honoraria costs.
6. The accomplishments of the Council appear in Exhibit F.

The Federal Advisory Committee Act provides that the Director of OMB must assign a Presidential council to an agency or to the General Services Administration in order to receive the required support services. It is currently held that since the advisory council falls under the Labor-HEW Appropriation it is more properly serviced by HEW units, and therefore as delegated by OMB, the NACEDC is now assigned to HEW for support services in the form of technical assistance, budget, and staff.

Thank you for including us in the proceedings.

Sincerely,

Roberta Lovenheim

Roberta Lovenheim, Exec Director

Congressman Carl Perkins
Chairman, Committee on Education & Labor
B-346-C Rayburn House Office Bldg.
Washington, D.C. 20515

TESTIMONY OF DR. WILBUR H. LEWIS TO THE HOUSE SUBCOMMITTEE ON EDUCATION
AUGUST 4, 1977

Thank you. My name is Dr. Wilbur H. Lewis. I am Vice-Chairman of the National Advisory Council on the Education of Disadvantaged Children, Chairman of its Executive Committee, Chairman of the Ad Hoc Committee on Barrera vs. Wheeler and co-Chairman of the Committee on Indian and Migrant Education. I am currently employed fulltime as the Superintendent of Public Schools in Tucson, Arizona.

This Council appreciates the opportunity to present its track record as you undertake a needed review of statutory advisory councils established under the Elementary and Secondary Education Act.

When you return from your work period, two proposals will be presented to reduce the number of advisory committees. One will be contained in the Commissioner's Annual Report and the other will be sent to the House Government Operations Committee as a part of the Reorganization Plan. Congress will then have 90 days to act. This oversight hearing should give you the data you require to respond to those initiatives.

As one of the 38 statutory Presidential advisory committees funded by the federal government, the NACEDC's activities reflect the statutes which govern it. (EXHIBITS A - C)

Broad community participation in the governance of education is a basic principle of American education. The advisory committee system has proven to be a vehicle to safeguard this participation at the federal level. The NACEDC has assumed a role not originally in its statutory obligation to make legislation more responsive to those children being served. Local and state community advice through formal and informal mechanisms contributes the purposes, priorities and objectives of educational programs. The advisory council mechanism serves the same purpose at the federal level.

The NACEDC has been the focus for the complex constituency concerned with improving educational attainment for educationally disadvantaged children enrolled in elementary and secondary schools. The diverse background of the members and their selection from representative geographical regions have contributed to an agency uniquely capable of objectively considering needed improvements in compensatory education. The council has visited with many groups throughout the country, received testimony from administrators, teachers, students, parents and concerned citizens, held hearings, held the first meetings in Washington for parents of ESEA Title I children, and for all of the State Title I Coordinators, and operated as openly as possible with the funds allocated to it so as to gather opinions and advice from those affected by the implementation of ESEA Title I.

Once determined, these recommendations are then presented to the appropriate officials for consideration and adoption. Hundreds of NACEDC recommendations have become part of law, policy and practice. We are proud of this achievement. The NACEDC has experienced the necessity of bringing citizen advice and priorities to bear on a program where between 33-50% of the eligibles receive needed services. Citizens should be involved in these critical and difficult choices.

This hearing is called to review administrative practices as well as individual advisory committees. Any consideration of the Congress to strengthen the effectiveness of advisory councils should include strong emphasis on:

1. A system of Committee Management implemented at the OMB level which provides a manual and a series of training opportunities for newly established committees, to curtail the large waste of tax dollars during the start-up period of a new council.

2. Announced common criteria for evaluating advisory committee effectiveness agreed upon and implemented. The GAO study on advisory councils* suggests the following four criteria:

   -- the larger the number of committee meetings, the more actively the council is pursuing its charge.

   -- the larger the support costs incurred indicates agency commitment to the council.

   -- the age of a committee should create a red flag, under the assumption that older committees _may_ no longer be required.

   -- the number of reports and recommondations made and adopted indicate effectiveness.

3. Involving the affected community in the determination of priorities and services as a basic principle of governance in American education, and as a necessary linkage for effective public administration.

---

*"Better Evaluations Needed to Weed Out Useless Federal Advisory Committees" B-127685.

In closing, we appreciate the formal evaluation by this Subcommittee, since we are dependent upon an effective system of advisory council management.

The remaining exhibits of my statement respond to the letter of invitation sent to the council.

Please contact our staff if you have any further need for more information. (Telephone: (202) 724-0114.) Contact person - Mrs. Lovenheim

Thank you.

EXHIBIT A

Elementary and Secondary Education Act of 1965

TITLE I—FINANCIAL ASSISTANCE TO LOCAL EDUCATIONAL AGENCIES FOR THE EDUCATION OF CHILDREN OF LOW-INCOME FAMILIES

DECLARATION OF POLICY

SEC. 101. In recognition of the special educational needs of children of low-income families and the impact that concentrations of low-income families have on the ability of local educational agencies to support adequate educational programs, the Congress hereby declares it to be the policy of the United States to provide financial assistance (as set forth in the following parts of this title) to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means (including preschool programs) which contribute particularly to meeting the special educational needs of educationally deprived children.

(20 U.S.C. 241a) Enacted April 11, 1965, P.L. 89-10, Title I, sec. 2, 79 Stat. 27; redesignated and amended January 2, 1968, P.L. 90-247, Title I, secs. 108(a)(2), 110, 81 Stat. 786, 787; amended April 13, 1970, P.L. 91-230, sec. 113(b)(2), 84 Stat. 126.

NATIONAL ADVISORY COUNCIL

SEC. 148. (a) There shall be a National Advisory Council on the Education of Disadvantaged Children (hereinafter in this section referred to as the "National Council") consisting of fifteen members appointed by the President, without regard to the provisions of title 5, United States Code, governing appointment in the competitive service, for terms of three years, except that (1) in the case of initial members, five shall be appointed for terms of one year each and five shall be appointed for terms of two years each, and (2) appointments to fill vacancies shall be only for such terms as remain unexpired. The National Council shall meet at the call of the Chairman.

(b) The National Council shall review and evaluate the administration and operation of this title, including its effectiveness in improving the educational attainment of educationally deprived children, including the effectiveness of programs to meet their occupational and career needs, and make recommendations for the improvement of this title and its administration and operation. These recommendations shall take into consideration experience gained under this and other Federal educational programs for disadvantaged children and to the extent appropriate, experience under other public and private educational programs for disadvantaged children.

(c) The National Council shall make such reports of its activities, findings, and recommendations (including recommendations for changes in the provisions of this title) as it may deem appropriate and shall make an annual report to the President and the Congress not later than March 31 of each calendar year. Such annual report shall include a report specifically on which of the various compensatory education programs funded in whole or in part under the provisions of this title, and of other public and private educational programs for educationally deprived children, hold the highest promise for raising the educational attainment of these educationally deprived children. The President is requested to transmit to the Congress such comments and recommendations as he may have with respect to such report.

20 U.S.C. 241l) Enacted April 11, 1965, P.L. 89-10, Title I, sec. 2, 79 Stat. 34; amended Nov. 3, 1966, P.L. 89-750, Title I, sec. 115, 80 Stat. 1197; redesignated and amended Jan. 2, 1968, P.L. 90-247, Title I sec. 108(a)(4), 110, 114, 81 Stat 786–788; amended and redesignated April 13, 1970, P.L. 91-230, Title I, secs. 112, 113(b)(4), 84 Stat. 125, 126.

EXHIBIT F

ACCOMPLISHMENTS

Hundreds of recommendations of the NACEDC have become part of the policy, practice regulations or law governing compensatory education at the federal or state level, as well as some in committee management. The tax reform carries Council recommendation.

The Council's effectiveness is further underscored by the fact that Congress, the Courts, peer advisory groups and the Domestic Council seek the Council's advice on specific items.

The Committee Management/ Health, Education and Welfare cites our Council as exemplary among those funded by HEW, and this includes management, style and effectiveness. HEW is the agency with the largest number of advisory councils in the government.

The NACEDC issues at least one major report each year, and is asked to comment in writing on detailed legislative initiatives. The Council is one of the very few which adopts an annual plan each report year. (See Exhibit I and J). The Council accomplishes its work without contracting outside of the members appointed to serve the Council, and with a minimum of outside consultants. However, the key accomplishment of the Council has been to channel and encourage citizen comment and knowledge of the program to appropriate officials in a focused and objective manner. Organizations and individuals views are a part of the monthly reports of our activities.

The Council has generated greater coordination among Office of Program Planning & Evaluation/USOE and NIE Compensatory Education staff in education evaluations of educationally disadvantaged children through FICE participation. Further participation in FICE has led to opportunities' for increased acceptance of council recommendations among those who can implement them at the agencies.

The Council's participation in the Barrera amicus lead to more program comments being included, in addition to the legal citations and advice on program, this was an important component. Further, the one legal key to the case was suggested by the NACEDC.

EXHIBIT H

NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN

425 Thirteenth Street, N.W., Suite 1012
Washington, D.C. 20004
(202) 382-6945

FISCAL YEAR 1976 - INCLUDES TRANSITION QUARTER - TOTAL 15 MONTHS

Permanent Staff -	33 pay periods	$170,819.68
	Fringe Benefits @ 9.1%	15,544.59
" " -	Travel	
	Local Travel	556.45
	Out of town meetings	9,046.99
Council Members		
	Honoraria	51,640.00
	FICA	3,020.94
	Travel	54,003.38
1 Consultant (10 days)		1,000.00
Photocopier		4,200.00
1976 Annual Report - GPO		4,600.00
Printing - Interim Reports, Envelopes, etc		1,400.00
IBM Maintenance Contract		382.78
Subscriptions		1,177.14
GSA Supplies		1,667.65
Office Equipment		581.69
Training...(Staff)		1,800.00
	TOTAL	$321,441.29

NACEDC ACTIVITY PLAN REPORT YEAR 1977

Prepared by: NACEDC Staff October 1976

COUNCIL'S PROPOSED PLANNING OUTLINE

ACTIVITY YEAR 1976-1977

Introduction

The NACEDC is required by law to review and evaluate all Federal compensatory education programs, with emphasis on ESEA, Title I, and report their findings and recommendations to the President and the Congress as often as the Council deems appropriate; and submit an Annual Report on or before March 31 of each calendar year. Findings and recommendations are on the various compensatory education programs funded in whole or in part under Title I, which hold the highest promise for raising the educational attainment of educationally deprived children.

In accordance with the Council's statutory obligation, this draft proposal has been designed to provide a basis for drawing conclusions and recommendations about the needs for continuing and/or new legislation and programs designed to serve the disadvantaged population.

With the upcoming review and reauthorization of ESEA, Title I, in 1978, special reports will be prepared based on a review and analysis of the effectiveness of alternative ways of fulfillment of this goal. Council will devote special attention to examining the relative effectiveness of various reauthorization approaches for compensatory education programs, and comment on the predictable impact these programs have on serving children enrolled in these programs.

It is expected that results from Council's substudies (adolescence, mandated studies, and parent involvement), will be applicable to a broad range of issues relating to educational policies and practices.

In line with the above, the primary purpose of this proposal is to:

A. Develop a conceptual framework within which Council's comparison and evaluation of various legislation can be made.

B. Develop and describe specific procedures for gathering, analyzing and commenting on the findings of research efforts of the individual committees.

NACEDC COMMITTEE STRUCTURE

Legislative Committee

The Committee will examine, comment and develop recommendations on pending, proposed and future compensatory education legislation.

Mr. J. Alan Davitt*
Dr. Wilbur H. Lewis
Mrs. Dorothy M. Fleegler
Mrs. Carol L. Schwartz
Vacancy
Vacancy

Committee on Adolescence

The Committee will examine, identify and define compensatory education services which impact and assist adolescents who do not respond to the traditional junior and senior high school settings.

Dr. George Willeford*
Mrs. Sarah Moore Greene
Dr. Ben Reifel
Mrs. Rosella Lipson
Vacancy
Vacancy

Committee on Mandated Studies

The Committee will review, monitor and advise on the evaluations mandated by Public Law 93-380, which impact on the delivery of compensatory education services; with special emphasis on the NIE study which Council is mandated to be involved in.

Mr. J. Alan Davitt
Mrs. Dorothy M. Fleegler
Dr. Wilbur Lewis
Vacancy*
Vacancy
Vacancy

*Committee Chairman/Chairperson

Committee on Parent Involvement

The Committee will review and report on parent participation in compensatory education programs.

Mrs. Carol Schwartz*
Mrs. Sarah Moore Greene
Dr. Ben Reifel
Dr. George Willeford
Mrs. Rosella Lipson
Mrs. Mary Anne Clugston

Executive Committee

The Committee is composed of the Vice-Chairmen, and the Chairmen of all Committees; coordinates the development of information for the annual report; and performs interim assignments as delegated by the Chairman of NACEDC

*Committee Chairman/Chairperson

The Chairman serves ex officio all Committees

LEGISLATION COMMITTEE

OBJECTIVES:

To review proposals under consideration in the executive and legislative branches of federal, state and local governments designed to meet the needs of disadvantaged children;

Submit to the full Council for comment, review and approval recommendations on policy and/or legislation, which the committee determines would best address the needs of children.

AREAS OF EMPHASIS:

I. A thorough examination of pending proposals aimed at delivering services to "disadvantaged" children; i.e., existing formula changes (Orshansky Index); block-grant proposals; consolidation grant proposals; equalization proposals; others.

TASKS: A. Analysis of all proposals introduced in Congress to meet the needs of Title I children; in particular, those aimed at the reauthorization of Title I legislation;

B. Review of existing legislation, and problems the Office of Education, States and Local Educational Agencies are having in administering present law;

C. Briefings with administration, agency and congressional personnel associated with the various proposals for Title I reauthorization;

D. Develop special reports for any legislation dealing with the above proposed changes in Title I, as deemed necessary by the Chairman;

E. Formulate specific legislative recommendations on the upcoming reauthorization of Title I legislation;

F. Establish liaison with the Authorization, Appropriation and Budget Committees of both the House and the Senate;

G. Report periodically, when the Council deems it appropriate to these Committees as they consider legislation affecting the delivery of services to the targeted population.

II. To identify programs and practices currently employed expending Title I funds; problems experienced and make recommendations for future changes.

TASKS: A. Coordinate with selected site visits to examine various components of current Title I legislation which the Council has designated as areas of concern:

—concentration of funds
—comparability
—aid to nonpublic schools
—delivery of services
—cultural diversity
—maintenance of effort
—revenue sharing
—desegregation
—reauthorization

B. Meet with state and local personnel in the various site areas to determine what they perceive to be needed legislative changes in present law, and to solicit responses to such questions as:

What impact has the delivery of services had in local school districts?

Are communications effective between the Office of Education and the State and Local Educational Agencies? Do you see any way they might be improved?

What do you feel about the present Federal-state partnership in delivering services to children? Any recommendations for future change?

C. Develop specific recommendations from the experience of site visits.

D. Attempt to determine what impact, if any, state and local evaluations of Title I are having on proposals for amending legislation through both site visits and the examination of proposed legislation.

E. Determine, through the various site visits, which components mentioned above are a necessity for the effective formulation of any compensatory education legislation.

PERIOD OF COMMITTEE STUDY:

All committee work, including site visits and research, will be completed and ready for full Council approval on or before January, 1977. Briefings in this area will be concentrated in April, May and June on Council activity. A committee first draft will be available to full Council for approval during the September, 1976 Council meeting.

TRAVEL AND SITE VISIT INFORMATION:

As stated earlier, all site visits made by the legislation committee will be held in conjunction with sites approved in advance by the full Council. (See selected sites, on pages 16 -32 .)

DESCRIPTION OF FINAL PRODUCT

The report year product of the legislation committee will include a section of the annual report, outlining those proposals which are felt to best address the needs of the educationally disadvantaged youngster.

In addition to the annual report section, the legislation committee will be prepared to recommend to the full Council action that should be taken by the full Council on specific recommendations to the President and Congress through special reports presented as Congressional testimony and/or meetings with the President and Congressional members, letters, etc.

COMMITTEE ON ADOLESCENCE

OBJECTIVES:

To examine, identify and define compensatory education services which impact and assist adolescents who do not respond to the traditional junior and senior high school settings.

Submit to the full Council for comment, review and approval recommendations on policy and/or legislation, which the committee determines would best address the needs of these children.

AREAS OF EMPHASIS:

I. To identify factors which influence the educational achievement of children during their adolescent years and examine Federally sponsored programs which address the needs of educationally disadvantaged adolescents.

TASKS: A. Conduct literature reviews of authoritative information on education for adolescents and the needs of educationally deprived adolescents;

B. Research current educational thoughts and practices designed to address the needs of educationally disadvantaged adolescents;

C. Conduct briefings with the Federal and State officials involved in planning and providing special educational programs for the educationally disadvantaged adolescent;

D. Develop an outline of the major educational needs of educationally disadvantaged adolescents;

E. Identify areas within Title I and/or other Federally sponsored, State or local sponsored educational programs which can be utilized to meet the educational needs of adolescents functioning below grade level.

II. To identify promising programs and practices currently designed to meet the needs of the educationally disadvantaged adolescent.

TASKS: A. Conduct site visits to areas in which programs meeting the needs of educationally deprived adolescents are currently in operation.

B. Review information on promising programs to meet the educational needs of adolescents and the results of such program efforts.

III. To recommend to the President, Congress and State and local educators via the 1977 Annual Report, modifications in Federally sponsored educational programs which will, if implemented, significantly increase the number of high school graduates who are able to enter into the world of work or higher education institutions or vocational schools successfully.

TASKS: A. Summarize and highlight the major problems created by large numbers of adolescents functioning below grade level.

B. Highlight the primary causes of educational disadvantagement among adolescents.

C. Discuss applications of Title I and other Federally sponsored educational programs which might be instituted on a wide scale and will reduce the number of adolescents graduating from high school without skills necessary for their future employment or education.

D. Highlight current programs the Council believes are effective in meeting the needs of the educationally disadvantaged adolescent and can be replicated in other school districts.

E. Develop Special Report

F. Recommend legislative and/or administrative actions to improve the educational achievement of disadvantaged children during their adolescence.

PERIOD OF COMMITTEE STUDY:

All committee work, including site visits and research, will be completed and ready for full Council approval on or before January, 1977. Seminars in this area will be concentrated in April, May and June on Council activity. A committee position paper will be available at the September meeting and a first draft will be presented to the full Council for approval in October.

TRAVEL AND SITE VISIT INFORMATION:

As stated earlier, all site visits made by the committee on adolescence will be held in conjunction with sites approved by the full Council.

DESCRIPTION OF FINAL PRODUCT:

The final product of the Committee on Adolescence will be a section of the 1977 Annual Report focusing on the social and individual needs for improvement in the educational achievement of adolescents and Federal efforts which can be implemented within the framework of compensatory education and other Federally sponsored education programs designed to assist in meeting these needs.

COMMITTEE ON MANDATED STUDIES

OBJECTIVES:

Monitor and review evaluation studies (with emphasis on the NIE compensatory education study) which is a Council mandate and develop a council document for inclusion into the 1977 Annual Report.

AREAS OF EMPHASIS:

A. Review and analyze progress of report

B. Conduct briefings with appropriate personnel

C. Attend meetings conferences and briefings which impact on studies

D. Visit several demonstration projects sponsored by the NIE

E. Follow up document to previous Interim report

F. Participate on review teams of NIE study.

PERIOD OF COMMITTEE STUDY:

All committee work, including site visits and research will be completed and ready for full Council approval on or before January, 1977, however, monitoring of the various agencies doing evaluations of compensatory education will continue. A committee document will be available and presented to the full Council for approval when necessary.

TRAVEL AND SITE VISIT INFORMATION:

As stated earlier, site visits made by the Mandated Studies Committee will be held in conjunction with sites approved by the full Council, but will include indepth discussions with state and local officials.

COMMITTEE ON PARENT INVOLVEMENT

OBJECTIVES:

Review the effectiveness of parent involvement, define an effective criteria, and develop modifications desirable for Title I, and/or other Federally assisted educational programs impacting on disadvantaged children which have parent involvement components and determine the correlation with students achievement.

AREA OF EMPHASIS:

I. To identify areas of present title I program operation which could be modified to increase the effectiveness of the parents' role.

TASKS: A. Conduct interviews with parent advisory council members during site visits.

B. Attend meetings, seminars and conferences in which issues regarding parents in Title I programs are discussed.

C. Conduct other activities arising out of research and/or events during the report period.

PERIOD OF COMMITTEE STUDY:

All committee work, including site visits and research, will be completed and ready for full Council approval on or before January, 1977. Seminars in this area will be concentrated in April, May and June on Council activity. A committee position paper will be available at the September meeting and a first draft will be presented to the full Council for approval in October.

TRAVEL AND SITE VISIT INFORMATION:

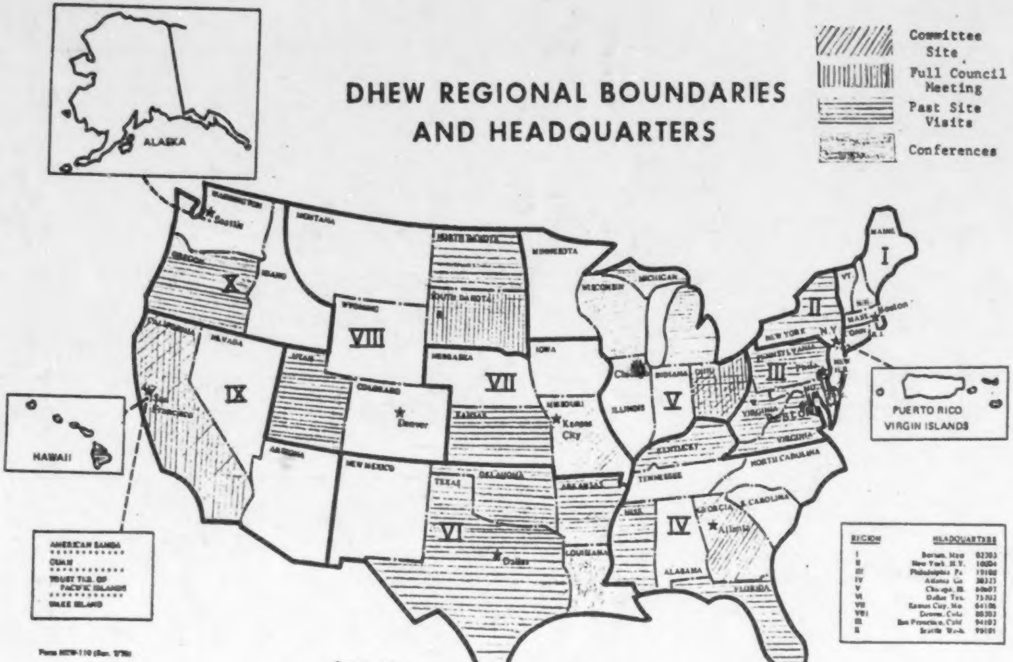
As stated earlier, all site visits made by the Parent Involvement Committee will be held in conjunction with sites approved by the full Council.

DESCRIPTION OF FINAL PRODUCT:

The Committee on Parent Involvement will be expected to participate in the preparation of those sections of the Annual Report which address the role of parents in Title I programs.

1977 ANNUAL REPORT YEAR COUNCIL ACTIVITIES

EVENT	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DEC.	JAN.	FEB.
FULL COUNCIL MEETINGS	D.C.	Calif.	D.C.	D.C.	Delaware	D.C.	South Dakota	none	Cleveland, Ohio	D.C.	D.C.	D.C.
COMMITTEE MEETINGS		Leg.C. Adol.C. Man.St. P.I.C.	Leg.C. Adol.C. Man.St. P.I.C.	Leg.C. Adol.C.	Leg.C. P.I.C.	Leg.C. Adol.C. Man.St.		Leg. C. Adol.C.	Man.St.			
SITE VISITS					Wilmington and Symrna, Del.	Missouri	North and South Dakota		Cleveland, Ohio			
CONFERENCES		San Fran Calif. (State Admin.)	Reston (DayCare) N.J. (St.Adm.) Phil(Mig)					Los Ang. (Voc.Ed.) N.O.,La. (ESEA Parents)				
SEMINARS				Adol.	Indian Educ.			Adol.				
ADVISORY POLICY PANEL MTG.		USOE's RMC Report NIE's Study of N & D Progs.		NIE's Study of Alterna. Approach								
ANNUAL REPORT								Annual Report Outlines		First Draft	Second Draft	Final Editi



DHEW REGIONAL BOUNDARIES AND HEADQUARTERS

▨ Committee Site
▥ Full Council Meeting
▤ Past Site Visits
Conferences
ALASKA
HAWAII
PUERTO RICO
VIRGIN ISLANDS
AMERICAN SAMOA
GUAM
TRUST TER. OF PACIFIC ISLANDS
WAKE ISLAND
WASHINGTON
OREGON
CALIFORNIA
IDAHO
NEVADA
MONTANA
WYOMING
UTAH
COLORADO
ARIZONA
NEW MEXICO
NORTH DAKOTA
SOUTH DAKOTA
NEBRASKA
KANSAS
OKLAHOMA
TEXAS
MINNESOTA
IOWA
MISSOURI
ARKANSAS
LOUISIANA
WISCONSIN
MICHIGAN
ILLINOIS
INDIANA
OHIO
KENTUCKY
TENNESSEE
MISS.
ALABAMA
GEORGIA
FLORIDA
S. CAROLINA
NORTH CAROLINA
VIRGINIA
W. VIRGINIA
PENNSYLVANIA
NEW YORK
MAINE
VT
N.H.
MASS.
CONN.
R.I.
N.J.
MD.
DEL.
I
II
III
IV
V
VI
VII
VIII
IX
X
Seattle
San Francisco
Denver
Kansas City
Dallas
Chicago
Atlanta
Phila.
N.Y.
Boston
Form HEW-110 (Rev. 1/76)

REGION	HEADQUARTERS	
I	Boston, Mass.	02203
II	New York, N.Y.	10004
III	Philadelphia, Pa.	19108
IV	Atlanta, Ga.	30323
V	Chicago, Ill.	60607
VI	Dallas, Tex.	75202
VII	Kansas City, Mo.	64106
VIII	Denver, Colo.	80202
IX	San Francisco, Calif.	94102
X	Seattle, Wash.	98101

ESTIMATED EXPENSES FOR SCHEDULED SITE VISITATIONS

Location	Date	Number of Days	Council Participants	Staff Participants	Air Fare	Per Diem	Honoraria
Illinois	May	2	4 - Committee	1	$736	$330	$800 (2 days)
Washington State	June	3	4 - Committee	1	$1,840	$495	$800 (2 days)
* Delaware	July	2	10 - Full Council Meeting	4	$1,155	$1,474	$2,800 (2 days)
North Carolina	July	2	4 - Committee	1	$700	$330	$800 (2 days)
Georgia	August	2	15 - Full Council Meeting	4	$2,976	$1,122	$2,800 (2 days)
New York State	August	2	4 - Committee	1	$380	$330	$800 (2 days)
* South Dakota	September	4	10 - Full Council	4	$3,547	$1,982	$2,800 (1-4 days)
Minnesota	September	2	4 - Committee	1	$950	$330	$800 (2 days)
Rhode Island, Conn., and Massachusetts	October	3	15 - Full Council & Committee	4	$2,930	$1,989	$4,200 (3 days)
**Los Angeles, Calif.	October	2	2 - Committee	-	$224	$111	$200 (1 day)
**Ohio	November	2	15 - Full Council Meeting	2	$2,312	$922	$2,800 (2 days)
Las Vegas, Nevada	December	2	15 - Full Council Meeting	4	$5,280	$1.122	$2,800 (2 days)

* Sites visited

** Planned site visitations

All the other site visitations were cancelled due to budget constraints

CANCELLED

SUGGESTED SITE DESCRIPTIONS

Program: Alternative Learning Project (ALP)

Location: Providence, Rhode Island
Contact: Ms. Barbara Tucker
Mr. Chuch Kenyon
(401) 272-2080

Program Description:

ALP is a community-based experimental high school that combines a strong basic skills program with site placement activities and continuous counseling. The students' only common denominator is dissatisfaction with traditional school settings.

The program offers a broad range of teaching and learning styles and features small group and individualized instruction. Emphasis is placed community involvement—student projects in city; instruction by volunteers and professionals in the community.

Services are provided to approximately 125 students utilizing 8 fulltime staff persons. There are about 80 classes and tutorials held at the school facility and about 50 sites located in organizations, professional offices, and other schools in the city.

Targeted audience:

Students of all abilities in grades 9 thru 12 and in some instances, students from the middle school thru the adult level can either enroll in complete programs or adapt to supplement an ongoing program.

Per pupil Cost:

The per pupil expenditure is slightly below the city average for secondary level. Exclusive for training and perhaps rent for a separate facility, the program could be adopted with no additional to a local educational agency.

CANCELLED

Suggested Site visits

Program: High School in the Community (HSC)

Location: New Haven Connecticut
Contact: Mr. Edward Linehan
Dissemination Coordinator
(203)624-1357

Program Description:

HSC is a small innovative alternative to the traditional high school programs. It provides students and their parents a choice of learning environments within the public school system. The only common denominator of students entering into this program is dissatisfaction with their previous school experience.

Students are permitted to, with the assistance of staff advisors, plan their own programs which includes selections from a full range of courses.

A general classroom atmosphere of high student involvement, innovation, teacher support, and student-to-student affiliation, with low teacher control and student competition is utilized. HSC does not give letter grades, and students receive descriptive evaluations which indicate their work accomplishments and suggestions for making improvements in their courses.

Targeted audience:

Disaffected high school students, all ability levels.

Per pupil expenidtures:

Specific cost of an adoption to this type of program depends on how large a unit is developed (50-300 students). General operating cost will reflect the per-capita expenditures of the adopting school system.

Training:

Training will involve a 5-day workshop for teachers and administrators.

CANCELLED

Suggested Site Visits

Program: Project Focus

Location: Roseville, Minnesota
Contact: Ms. Sue Schillinger
Project Coordinator

Program Description:

The overall goal of Project Focus is to decrease the incidence of alienation among students, faculty, and the community at large. Focus provides an alternative educational plan for students who have been identified as disaffected and showing a lack of motivation, lack of confidence, and low self-esteem. Many of these students also have reading problems and function in school well below their capacity socially and/or academically.

Students are screened for admission but enroll voluntarily. Once enrolled, they are required to be in the program for at least three hours a day, part of which is a family course using group counseling techniques. Focus also offers modified versions of required high school courses (social studies, English, math) as well as work experience. Biology, art, and physical education are taken in the regular school.

A combination of various teaching strategies and styles is used, including both group and individualized instruction. Focus students are involved in the development and evaluation of course materials.

Targeted audience:

Disaffected secondary students, all ability levels.

Per Pupil expenditures:

Cost will differ due to individual organization of area and availability of special reimbursements in that area.

Training:

Training can be done at D/D Site for a period of four days or through a workshop at adopter site, provided more than one school is involved.

CANCELLED

Suggested Site Visits

Program:	St. Paul Open School
Location:	St. Paul, Minnesota Contact: Mr. Joe Nathan Director

Program Description:

The St. Paul Open School is a comprehensive, voluntary learning environment which actively involves all members of the community—students, teachers, parents and others—in the learning process. The basic relationship in the school is the advisor-advisee. Each student chooses an advisor with whom the student meets weekly to discuss goals and progress. Parents meet with their child and his/her advisor in the beginning of the school year and 3 other times to set goals and discuss progress. Each student's schedule is different, and may include classes, independent study, local and cross-country trips, and internships or apprenticeships with business people or community agencies. No courses are required, but students must demonstrate certain competencies before graduating. The St. Paul Open School is located in a former warehouse that is remodeled continuously by students, parents, and staff to meet needs.

A wide variety of methods are used, with emphasis on teacher as facilitator. At different times, with various students, this will require skills in lecturing, counseling, leading discussions, developing role-plays, making use of community resources, and helping students teach each other.

Targeted audience:

Students of all abilities, grades K-12.

Per pupil expenditures:

St. Paul Open School operates on average St. Paul per pupil expenditures. Exclusive of training, no additional funds would be required.

Training:

Present plans call for one-week workshops given 3-4 times during year.

CANCELLED

Suggested Site Visits

Program:	Community Planning Council on Educational Alternatives (CPCEA)
Location:	New Haven, Connecticut Contact: Mrs. Patricia Kinman, Coordinator Mr. James Sullivan, Advisor (203)776-7756 (203)777-2160

Program Description:

CPCEA is made up of city-wide representation of parents, students, teachers and administrators who are prepared to advise and support the implementation of suitable educational options at every level and in every context of the school system. Its broad goals are: 1) to enlarge the commitment and influence of the community in the education of their children and youth through development of a pluralistic system of education, and 2) to firmly establish schools of choice, including schools within schools, in the community as a sensible and purposeful first step in this developmental process.

CPCEA is a process whereby parents, students, teachers, and administrators participate in decision-making and collecting and disseminating information on educational alternatives/options.

Targeted audience:

Parents, teachers, students, school administrators and other members of the community at large (public and non-public).

Per pupil expenditure:

Operational costs will vary between $0.75 and $1.00 per pupil.

Training:

Training will be held for up to two days and will be adjusted to meet the needs of the community.

CANCELLED

Suggested Site Visits

Program: Help One Student To Suceed (HOSTS)

Location: Vancouver, Washington
Contact: Bill Gibbons
Project Director
(206) 694-1705

Program Description:

The HOSTS program is designed to improve the reading ability of students in grades K-12 and illiterate adults. Reading curricula have been modified through utilization of criterion-referenced tests, individualized reading profiles, and one-to-one tutoring. The program focuses on resources available in communities to help fight illiteracy and management procedures necessary to coordinate an effective reading program. As a result, reading instruction has been adapted to a personalized approach for each student.

Reading specialists diagnose student reading deficiencies, select appropriate materials and activities, assess students continuously, and give the directions to tutors who provide one-to-one instruction. (This project is operating as a funded developer/demonstrator.)

Targeted audience:

Kindergarten through grade 12 and adults; remedial reading; community volunteers and cross-age tutors provide instruction in reading.

Per pupil expenditures:

HOSTS has a start-up cost of $115.45 per pupil and a continuation cost of $12.73 per pupil per year. (Figures based on 1,000 target pupils.)

Training:

Five-day workshops are offered by HOSTS staff prior to implementation.

CANCELLED

Suggested Site Visits

Program: Positive Attitude Toward Learning (PATL)

Location: Bethalto, Illinois
Contact: Charles F. Pelan, Director
(618) 377-5211, ext. 79

Program Description:

Project PATL is a performance-based inservice training program designed to improve student attitudes toward school through changing teacher behavior. An improvement in student attitude toward school, self, and others leads to improvement in the rate of cognitive growth. Teacher change is effected through the use of self-paced individualized, performance-based learning packages called Kits.

Teacher Training Kits teach specific skills in four complementary areas: Active Involvement Processes of Learning, Individualized Instruction, and Improved Self-Concept. Each Kit consists of five to seven performance-based teacher objectives to assist the teacher in reaching the objective, and criterion-referenced evaluation procedures. A final proficiency assessment is provided.

Targeted audience:

Teachers of all students K-12.

Per pupil expenditures:

Approximately $2,000 in start-up costs for purchase of assorted materials. Operational costs will vary with staff and curriculum resources of adopting schools. Training per 100 teachers per year:

Stipends for teachers:	$3,000
Materials & supplies:	4,000
Secretarial service: (1/4 time)	1,300
Total:	$8,300

Plus salary of one equivalent full-time inservice specialist.

Training:

The training consists of a 5-day program conducted at a site mutually agreeable to the adopting district and PATL.

NATIONAL ADVISORY COUNCIL ON THE EDUCATION
OF DISADVANTAGED CHILDREN
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SITE VISIT REPORT

Location: Capital School District, Dover, Delaware and Smyrna School District, Smyrna, Delaware

Name of Project: Dover Migrant Summer Program and Smyrna Migrant Summer Program

Date of Visit: July 22-23, 1976

Description of Program:

The State of Delaware operates six Title I/Migrant Compensatory Education Programs in three school districts within the State. These programs serve approximately 600 Migrant family children during the summer months — July and August -- and 200 "settled-in" Migrant children year round.

Curriculum concentration is placed in the areas of basic skills and oral language subjects. Each project is designed to meet the goals established in the State's minimum objectives for teaching basic skills. There is, additionally, a growing concentration on bilingual educational activities to meet the needs of the growing number of Spanish-speaking Migrant children.

The three summer programs are six-week courses, commencing in early July and ending in mid-August. They serve children from 5-17 years of age, with an associated component for very young children. The Capital School District's migrant summer program enrolls 135 children, with approximately 75% average daily attendance. Usually, the children not in attendance are the adolescent children who are in the migrant work force. Classes begin at 8:00 a.m. each week day and are dismissed at 7:00 p.m. each evening. Transportation is provided by the school.

The Smyrna Migrant Summer Program addresses the same type of migrant education needs in the Smyrna school district. Its enrollment is approximately 110, and its curriculum concentration identical.

Each migrant program within the State is coordinated through the Migrant Education Coordinator, with technical assistance available from the State's centrally operated Migrant Instructional Resource Center. Of special focus in such programs serving migrants is the recruitment of Migrant children for enrollment in the summer program upon their arrival in the State. Each child is given a physical exam upon enrollment and free meals are provided daily. Upon completion of the summer program, students' educational records are forwarded to the school district to which they will next move, and to the Migrant Student Record Transfer System.

The transient nature of the Migrant child's life pattern necessarily makes him the ongoing educational responsibility of no local school district. Furthermore, his movement from state to state places him in an analogous situation with state education authorities. Thus, the very nature of his way of life requires that the Federal Government which spans districts, state, and general areas of the country must exercise a special and direct responsibility. This reinforces the need for categorical programs which would provide specifically and directly for the Migrants' education.

Educational programs for children of migrant workers in the production of food and fiber are evidence of the acknowledgment of needs of heretofore largely unserved populations. In the migrant projects which were observed by the Council, a primary concern was the provision of supervised children during an extended day. Instructional and recreational activities were well integrated. A bilingual approach was in evidence in oral language at a beginner's level. The rest of the activities appeared to be concentrating on basic skills in English, areas of emphasis in Title I. The programs require two shifts of personnel to provide services from 8:00 a.m. to 7:00 p.m.

As with other migrant projects, there was a need for an expansion of the recruitment program. Also increased attention should be given to the migrant children in places where only two or three migrant families are employed. There may be a larger number, than we realized, who are not touched by these programs because of the isolation of the farms where employed. Some motivation should be established to interest the parents. Perhaps more coordinators. On the difficulty of attracting adolescent migrants, special research should focus on experimenting with alternative programs. How can programs designed for children of a stable lifestyle respond to the needs of migrants?

While not in the purview of migrant education, the overall salutary effect of a highly disciplined crew leader on the quality of life of migrant children was demonstrated. The living conditions and the attempt to provide maximum health factors and a wholesome environment was of high efficiency. Perhaps from a legal, not moralistic, standpoint some framework of operation for the crew leader would benefit children.

It is often difficult to locate newly arriving migrant families, particularly those families who choose to live outside of the large, established migrant communities. The program's migrant home/school coordinators need additional resources to help in locating and enrolling all eligible children. Efforts might be made to alleviate the long bus ride for those infants and young children by sending the professionals and para-professionals to the camp site — using one of the mobile homes and adding a mobile educational vehicle such as the Preschool Mobile which some Council members observed in Beverly Hills, California.

Additional efforts must be made to encourage young adult migrant workers to study courses necessary for completion of their General Education Degree.

SITE VISIT REPORT

Location: Wilmington, Delaware

Program: Project 70,001

Date of Visit: July 23, 1976

Description of Program:

Friday, July 23

The Council met at the local headquarters of Project 70001 at Price's Corner Shopping Center in Wilmington, Delaware. Chairman Owen Peagler opened the meeting and gave a brief overview of Council's activities, introduced the Council members and staff and informed the group of the purpose of the visit. Chairman Peagler then called Kenneth Smith, Vice-Chairman of NACEDC and President of Project 70,001 to introduce the Project's staff personnel. Mr. Smith briefly discussed the role and activities of Project 70,001 which was followed by a slide presentation which gave the participants a comprehensive overview of the history of the Project.

Project 70,001 was initiated in Wilmington, Delaware. The goal was to provide an avenue through which out-of-school youth (aged 16-22) could receive immediate employment, on-the-job training, education, personal motivation in career preparation and self-confidence necessary to enter and advance in the field of marketing and distribution.

The Project was founded as a special program of the Distributive Education Clubs of America (DECA) and separated in 1976 to aid national expansion and broader career objectives. It now operates as a private non-profit corporation funded in part by a contract with the National Programs Division of the U.S. Department o. Labor.

Project 70,001 boasts a 71% job retention rate over the first year of employment of participants. Project 70,001 costs $1000 per year/per student. This is far below the national average per Comprehensive Employment and Training Act (CETA) participant which runs $3,087 per year/per student.

In two and a half years Project 70,001 has grown from four model programs serving 200 young people to seventeen programs which will serve over 2,000 young people this fiscal year. This manpower training program has set goals which include the following: to reach a level of 50 operating programs within the next four years; to provide 7500 permanent positions for the program's recruits; to expand the project's concepts beyond distribution to other vocational disciplines and integrate the necessary new instructional programs to meet these needs; and to create new career opportunities and more sustained upward mobility for the program's participants.

Following this description of the National Project, Council members heard descriptions of how a local project operates. Ms. Manera Constantine, Program Manager of the Wilmington Project, explained that the Prices Corner Project enrolls 120 youths at any one time. A client applies to Project 70,001 and is given an orientation assessment, evaluation and testing. Based on this assessment, the student begins pre-employment training (ninety days), which includes individual vocational instruction, training for a Graduate Equivalency Diploma (GED), and youth self-confidence activities. The educational component continues after job placement has occurred, with the training scheduled around working hours. Constant follow-up supervision and guidance is provided by the 70,001 coordinator after the enrollee has found a job. The educational components are meshed with the job training to build the necessary skills for job retention and advancement. Students are eligible to remain in the Project until they receive the GED. The average stay is about six months.

The funding for the project comes from four sources: school district funds, the Mayor's City CETA funds, the CETA county funds and the Vocational Educational Amendments.

Mr. Peter Thompson, County CETA Coordinator, explained further the coordinator's role. The coordinator works in the development of jobs for his clients — jobs with promotional possibilities. Once a client is placed, the coordinator works with the client and the employer to discuss future possibilities. He stressed that the first month on-the-job was the most critical. Contact during this period takes place at least once a week. After that, contact is usually on a monthly basis, depending on the individual's needs.

Dr. Thomas Mintor, Superintendent of Wilmington Public Schools and Dr. Joseph Johnson, Assistant Superintendent, praised the success of this program. They pointed out that while these young people had experienced continuous rejection in both jobs and school, this project offered them their first taste of success. The high retention rate speaks for the success of the program.

The education component was further expanded by Mr. Ed Fields, reading teacher, and Mr. Michael Webb, City CETA Coordinator. The entire program is set at the individual's pace and needs. The aim in reading is for the student to reach the 6.8 level to handle the GED classes. These classes revolve around 124 books in English, Math, Science, Social Studies, and Literature. Concentration is based on student need as pointed out in the initial assessment. After completion, the student should be able to pass the GED exam. The Vocational Education component consists of 19 tapes, which include points on dress, job applications, interviews, and the phases and history of sales. Starting this Fall, the program will use tutors from the University of Delaware to aid students in this learning process.

Mr. Wilbert Cooper, Coordinator of the Vocational Education Component, expanded on the public relations aspect of Project 70,001, to inform high school dropouts about the program. The Project utilizes radio programs, public television, and its own national magazine, as well as leaflets and students participating in the program.

The Council was also introduced to two businessmen and a businesswoman who employ students from the project. Each stressed the willingness of the project's students to work hard. The students are interested and motivated, and their willingness to learn provides them with excellent opportunities to move into middle-management positions. Several students also expressed the reasons why they made the decision to enter this project -- a chance to make something of themselves and earn a living and obtain a diploma at the same time. Each had dropped out of school for their own particular reasons, and the Project offered them an opportunity to make informed decisions about their futures.

After these briefings, Council and staff took a tour of the facilities used for instruction. Individual tapes and machines are available for the vocational instruction component, which allows the student to proceed at his/her own pace. Tests are given at the end of each section to enable the student to determine how well the material has been grasped. A reading class in progress was also observed and it was apparent that the small group of students could receive individual attention and were very interested in the program.

Site Visit to North and South Dakota

Rapid City, —
Pierre
Pine Ridge
Mission
Crow Creek
Flandreau

Due to the vast expanse of territory to be covered this proposed visit will be made by several groups either before or after full Council meeting.

This visit will include a Full Council meeting in addition to visits to the above cities.

Programs to be observed are:

Catholic and Federally funded schools administered by the Bureau of Indian Affairs

Public Schools funded by Title I (including high school)

Indian Agency administering its own utilizing Title I funds

Senior high school (500 - 600 students)

Further details and descriptions of these programs are forth coming.

Following approval by the Council, Staff will work closely with Ben Reifel in the final preparations for this visit. It has been suggested that at least 4 days be set aside for this activity.

Suggested Site Visits

Northern Ohio — Cleveland
Parma
East Cleveland

1. Dropout Prone Disadvantaged Students (John Hay Annex)
2. Special Needs Program for Disadvantaged Adults (Adult Education Center)
3. Machine Shop Training for Spanish-Speaking Disadvantaged Persons (Lincoln Annex)
4. Elementary and Secondary Bilingual Classes (Various Schools)
5. ESEA Title I: Transition Project (Rawlings Junior High)
6. State Compensatory: Production Workshop Project (Rawlings Junior High)
7. Title I Reading Center
8. Target Elementary School for ESEA Title I and State Compensatory Funds
9. Secondary Program for Assessment & Evaluation—Sheltered Workshop
10. Extended & Enriched School Year (Elementary Grades & All Institutions) - Title I & State Compensatory
11. Vocational Information Program (VIP) (Kennard Junior High)
12. Supplementary Education Center

Note: Descriptions of these programs are forth coming.

Suggested Site Visits

Program:	Curriculum For Meeting Modern Problems (The New Model ME)
Location:	Lakewood, Ohio Contact: John R. Rowe Project Director Lakewood Board of Education

Program Description:

The New Model ME is designed to help high school students deal with how behavior develops, available alternative actions for solving personal problems, and the short- and long-range consequences of those alternatives. It is a positive, preventive approach to the study of human behavior and agression. The curriculum is flexible, appropriate for all students, and adaptable to student needs in a variety of school settings. It incorporates the causal approach to understanding human behavior and includes much material affective in nature.

The curriculum includes a wide variety of activities and seeks to promote much student and teacher interaction. A reasonably non-judgmental and flexible teacher who maintains an attitude of acceptance of young peoples' ideas and a willingness to listen to their opinions will be most effective with the curriculum.

Targeted audience:

All ability levels in grades nine through twelve. Used as a course in itself, to supplement existing courses, or with units selected as mini-courses.

Per pupil expenditures:

Cost per pupil the first year is approximately $5.00, based on a student population of 300. This includes the cost of texts and inservice training. Continuation costs are minimal if student tests are reused.

Training:

Training will involve a two-day workshop conducted by project staff.

Conclusion

The site visits descriptions, while incomplete in many details and unavailable for several site locations will be further developed and disseminated for approval by the full Council prior to being incorporated into the present plan.

Several of these sites were recommended by individual Council members and it is anticipated that these members will work directly with Staff in finalizing the site visit design.

While this is the proposed plan of activities for the 1977 report year, alterations can be considered as new developments arise.

An outline of the staff responsibilities for the completion of the overall plan will be forthcoming.

NACEDC
PRELIMINARY ACTIVITY PLAN,
REPORT YEAR 1978

Prepared by:
NACEDC Staff
July 1977

Introduction

The NACEDC plan for the 1978 Annual Report Year is prepared in response to the Council's direction during the April 11-12 meeting. Generally, it provides study plans for six areas of Council concentration and three study committees. In addition, there will be an ongoing committee and an Ad Hoc Committee.[1] Formal adoption of the plan by Council and the appointment of study committee chairpersons and members was accomplished at the May 20-21 Council meeting in Washington, D.C. Committee Structure outlined below.

Committee on Successful Programs/Parent Involvement

The Committee will develop procedures for reviewing criteria and identifying effective compensatory education programs; and, to assess the effective parental participation in local ESEA Title I programs.

Members:

Mrs. Carol Schwartz, Chairman
Mrs. Sarah Greene
Mrs. Rosella Lipson
Dr. George Willeford
Mr. Marvin Pomerantz
Dr. John Calhoun

Committee on Indian Education/Migrant Education

The Committee will review and comment on the administrative structure of programs impacting on education of Indian children and review ESEA, Title I Migrant programs.

Members:

Dr. Ben Reifel, Chairman
Dr. Wilbur Lewis
Mrs. Mary Anne Clugston
Mrs. Dorothy Fleegler
Mrs. Barbara Kilberg
State Senator John Leopold

Ad Hoc Committee (Barrera)

The Committee is to monitor developments and Council activities related to the Missouri Title I nonpublic school bypass.

Members:

Dr. Wilbur Lewis, Chairman
Mrs. Sarah Greene
Mr. J. Alan Davitt
Mrs. Barbara Kilberg

Mandated Studies Committee

The Committee is to monitor and advise the NIE national evaluation of compensatory education as required by P.L. 93-380.

Members:

Mrs. Dorothy Fleegler, Chairman
Mr. J. Alan Davitt
Mrs. Rosella Lipson

Committee on Legislative Testimony

The Committee is to provide ongoing Council advice on pending legislation, i.e., ESEA testimonies and other statements for congressional records.

Members:

Mr. M. Alan Woods, Chairman
Mr. J. Alan Davitt
State Senator John Leopold

The Executive Committee

The Committee is composed of the Chairmen of all committees and performs interim assignments as delegated by the Chairman of the NACEDC.

NACEDC REPORTS:

SUBJECT	DESCRIPTION OF REPORT
Elementary and Secondary Education	A special report indicating specific comments and recommendations in areas of elementary and secondary education which the Council has determined can be improved through federal efforts.
Paper Work Considerations	A commentary by the Council on the appropriateness of documentation required for federal educational assistance programs and recommendations of paperwork reduction activities.
Bilingual Education	Recommendations relating to the current and proposed services responding to those needs.
Emergency School Aid Act	A Council discussion of the current services available under this legislation and comments and recommendations for improvement in the services provided.
Impact Aid	A Council discussion of the current provisions of Title I's Impact Aid section and the Council's recommendations for modification of the Section of Title I.
Adult Education Career Education Woman's Equity	A Council discussion of current federal efforts and recommendations for improvement.
ESEA Titles II, III, Iv	A discussion of current services provided under these Titles and Council recommendations.
NIE Second Interim Report Comments	A report of the Council's assessment of the second NIE report on compensatory education with recommendations regarding the plan, the final report and comments on the information presented.
Office of Planning, Budgeting and Evaluation Study	Discussion of the Council's assessment of the information and approach contained in the studies.
Indian Education	A brief report highlighting the special needs of Indian children and recommending legislative and administrative action to improve educational services.

SUBJECT	DESCRIPTION OF REPORT
Briefing on Reports on Title I	Comments derived from Title I audits Comments derived from Title I comparability requirements. Comments on the special problems and compensatory education needs of urban population areas.

TESTIMONY

The Council will submit written testimony to the House Committee on Education and Labor regarding the General Education Provisions Act on August 4th and appear for testimony on ESEA, Title I in September.

The Council will provide advice as requested by the Assistant Secretary for Education.

NACEDC INTERIM REPORT

A compilation of the special reports issued this report year will be bound and submitted to appropriate Executive and Legislative branches of government in September 1977. The interim report will contain a cover letter by the Chairman indicating the views of the Council and the objectives of the interim report.

NACEDC COMMITTEE REPORTS

The Council will issue two Interim reports prepared by selected Committees.

I. Indian Education Interim Report

Objectives:

To identify which federal educational assistance programs impact Indian children. To illustrate the organizational paths of the programs, the flow of funds to the children, the monitoring systems for each program, and the strengths and weaknesses of the administration of these programs.

To recommend activities which can significantly improve the administration of these programs.

To recommend legislative and administrative activities to reduce the construction needs.

To discuss the implementation of community-based schools for Indian children, including the strengths and weaknesses of these programs.

Tasks:

1. Prepare summary discussions of each federal educational assistance program impacting Indian children.
2. To gather statistical information on the populations served, the money appropriated, the organizational structure of the program administration and the services provided with the funds.
3. To prepare graphic presentations of the organizational structure of federal programs impacting on Indian education.
4. To review the concept and implementation of community based schools for Indian children and comment on their effectiveness.

FINAL PRODUCT

The NACEDC Committee on Indian Education will prepare an interim report for Council review and adoption during the September Council meeting.

II. Parent Involvement Interim Report

OBJECTIVES:

To review the current role of Parent Advisory Councils in the administration, operation and evaluation of Title I programs.

To comment on the effectiveness of the current parent involvement structure and make recommendations on additional involvement components and revisions of regulations which can significantly increase the effectiveness of Title I programs.

To review training opportunities provided for Parent Advisory Council members and prepare comments and recommendations for improvements in the training opportunities.

TASKS:

1. Prepare background discussion on parent involvement in Title I projects and programs.
2. To summarize Council positions on parent involvement.
3. To gather information on a broad scale of the typical activities of most parent involvement groups, highlighting particular groups which demonstrate atypical activities which are either more or less effective than the norm.
4. To identify the current training activities provided for typical and atypical PACs.
5. To identify and discuss improvements in training opportunities provided to PAC members.
6. To recommend legislative and administrative activities to strengthen the effectiveness of Title I programs through more productive utilization of PAC members.

FINAL PRODUCT:

The Committee on Parent Involvement will prepare an interim report discussing the current role of PACs, current training of PAC members, recommending improvements in the designated role of PACs and in the technical training provided for PAC members. The report will be prepared for Council review and adoption during the September Council meeting.

NACEDC ONGOING COMMITTEES:

COMMITTEE ON LEGISLATIVE TESTIMONY:

This committee will guide staff in the development of all letter and oral testimonies to the legislative and Executive branches of the Federal Government. It will help in the preparation of a September oral testimony by the Chairman. It will have responsibility for drafting Council reactions to any legislative matters coming before the NACEDC.

COMMITTEE ON BARRERA vs. WHEELER:

This committee will continue to oversee the NACEDC's involvement in this case, and conduct any activities necessary for responding to future developments in the area of the nonpublic school bypass.

MANDATED STUDIES COMMITTEE:

The Committee on Mandated Studies will review all developments in the national compensatory education evaluations and review of educational programs of interest to the NACEDC, provide appropriate commentary on the developments of these studies.

ADDITIONAL COUNCIL ACTIVITIES:

The Council will undertake activities in the areas of Successful Projects, migrant education and mandated studies after the October 1st NACEDC Interim Report.

SUCCESSFUL PROJECTS

OBJECTIVES:

I. To develop NACEDC policies and procedures for project observations and criteria for the determination of practices within a Title I project which promote educational achievement among educationally disadvantaged children. To determine NACEDC responses to projects observed.

II. To identify effective practices in Title I projects and examine the common characteristics of these practices.

III. To develop and disseminate information on projects and practices identified as successful by the Council.

FINAL PRODUCT:

The Committee on Successful projects will develop for Council review and adoption a report highlighting projects and practices observed in geographical areas and the common characteristics of practices among all projects. It will recommend legislative and administrative actions to encourage implementation of such practices.

AREAS OF EMPHASIS:

I. Prepare NACEDC project observation policies and procedure format. Prepare preliminary criteria for determining effective practices in Title I projects.

Committee Activities:

A. Review staff briefings on suggested policies, procedure and criteria for effective practices. Finalize preliminary policy practice and criteria for use in this report year.

B. Utilizing preliminary criteria in developing project performance necessary for award of Council certificates. i.e. Certificate of Recognition and Certificate of Appreciation.

Staff Activities:

A. Undertake appropriate activities to identify areas of project concentration necessary for satisfactory levels of educational achievement among Title I participating students.

B. Prepare suggested NACEDC policies and procedures for site visit project observations and criteria for the determination of effective practices in Title I projects.

C. Develop preliminary project observation procedures, criteria for effectiveness and criteria for certificate awards based on Committee modifications.

D. Prepare Committee report for Council adoption.

II. Identification of Projects and Practices.*

Committee Activities:

A. Undertake project observations at sites predetermined by Council.

B. Report on the projects observed and present written comments on the effectiveness of its practices in relation to the Committee's preliminary criteria.

C. Meet with appropriate State and local educational officials and project personnel to determine administrative activities.

D. Present findings in written report to the full Council.

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*Extent of site observations may be limited by available funds.

Staff Activities:

A. Compile and present for Council review a listing and description of Title I projects for site observations.

B. Plan site visit observations for Committee members to projects predetermined by the Council as appropriate for site observations.

C. Prepare at least one week prior to each site observation appropriate background information on project objectives, implementation mechanisms, student population characteristics, financial information, administrative practices and test data.

D. Develop procedures for collecting information on criteria elements from projects to be observed.

E. Collect all information necessary for Committee review of ability of project observed to meet Council criteria.

F. Prepare Committee briefing of project and criteria which the project has or has not met.

G. Coordinate Committee member reports and prepare aggregate Committee site visit reports and observations.

H. Prepare Committee presentation of site visit reports and recommendations for full Council action related to the project and the award of certificates.

III. Identify common characteristics evident in projects.

Committee Activities:

A. Review effective practices observed on sites for common characteristics among different projects.

B. Comment on the importance of each effective practice to the educational achievement of participating students.

C. Review preliminary NACEDC project criteria and finalize based on site observation experiences.

D. Review and modify staff developed legislative and administrative recommendations based on Committee member comments.

E. Review draft report and modify for final Council adoption.

F. Recommend disposition of Council certificates.

Staff Activities:

1. Prepare Committee discussion of projects and practices observed, Committee member(s) comments and reports.

2. Analyze projects observed and prepare discussion of common characteristics of practices among projects.

3. Prepare Committee discussion of NACEDC preliminary criteria discussing strengths and weaknesses of this instrument and other information gathering processes. Recommend any modifications deemed necessary.

4. Prepare finalized site observation criteria for effective practices for Council review and adoption.

5. Prepare draft legislative and administrative recommendations based on Committee activities, comments and observations.

6. Prepare draft report for Committee on Successful Projects.

7. Prepare Council briefing and recommendations for disposition of project certificates.

8. Develop format for and dissemination of information on projects and practices identified by Council.

PERIOD OF COMMITTEE STUDY:

The Committee on Successful Projects will conduct its study during the months of May through December of 1977. A final draft report of their study will be presented to full Council for review in January of 1978.

CONSULTANT ACTIVITIES:

1. Indepth analysis of current Title I dissemination activities.
2. Indepth study of differing administrative practices among selected states.

PARENT INVOLVEMENT

OBJECTIVES:

I. To observe the involvement of ESEA Title I Parent Advisory Councils in the administration and operation of Title I projects and local district programs. To comment on:

   a. The areas of activity engaged in.
   b. The impact of PACs on the child's educational achievement.

II. To examine the technical training provided to PAC members, and determine the effectiveness of these training activities.

III. To examine alternative or additional modes of training for PAC members and recommend local, state and federal activities to strengthen the ability of PACs to contribute to their children's Title I programs.

FINAL PRODUCT:

The Committee on Parent Involvement will prepare for Council review and adoption a report discussing the role of PACs observed during site observations, the strengths and weaknesses of the organization, and the impact of the PAC on the Title I child's educational achievement. It will examine the present training activities at the local, state and/or national levels to increase the effectiveness of parents in Title I projects and local district programs.

AREAS OF EMPHASIS:

I. Determine the role of PACs in local projects and district-wide programs.

Committee Activities:

A. Review staff briefings on the role of PACs and comment on the accuracy and appropriateness of this interpretation.

B. Provide staff direction in preparing a preliminary outline of characteristics of PACs involvement to be observed during site observations.

Staff Activities:

A. Prepare committee discussion paper outlining the role of PACs (as stated by appropriate sources).

B. To receive committee member comments on the accuracy and appropriateness of such discussion paper and prepare for Committee use and outline of characteristics of PAC activities to be observed during site observations.

II. To observe the involvement of ESEA Title I Parent Advisory Councils.

Committee Activities:

A. Conduct site observations and meetings with PAC representatives.

B. To comment on the types of PAC activities undertaken local project and districtwide PACs in terms of appropriateness.

C. To comment on the strengths and weaknesses of the PAC organization and the impact of observed project PAC on the educational achievement of participating children.

Staff Activities:

A. Prepare Committee member observation outlines on areas of parent involvement.

B. Preparation of site observation activities.

C. Collection and dissemination to committee members of information of parent involvement activities and concerns at least one week prior to each site visit.

D. Collection and consolidation of committee member site observations and comments.

E. Preparation of draft site observation reports based on observed practices and committee member comments.

III. To examine the technical training currently provided to PAC members.

Committee Activities:

1. Review staff briefings on PAC member training activities.

2. To comment on the effectiveness of such training and recommend additional or alternative activities for improvement.

3. To review staff draft report on PAC member training and modify for subsequent adoption by Council.

Staff Activities:

1. Prepare committee briefing on PAC member training activities.

2. To undertake appropriate activities to identify underutilized or alternative training activities appropriate for PAC members. Report on findings to committee.

3. To correlate committee member comments and recommendations and prepare a draft report on PAC training for the committee.

4. To prepare a committee report highlighting PAC activities observed in Title I projects and local programs; to comment on present technical training activities undertaken at the local, state and federal levels; and, to recommend improvements in the training.

Period of Committee Study:

The Committee on Parent Involvement will submit a final draft report for Council approval in January of 1978.

INDIAN EDUCATION

OBJECTIVES:

I. Examine the legislative framework currently serving the educational needs of American Indians.

II. Examine the various roles assigned to parents among the current laws affecting Indian education.

III. Examine effectiveness of the Indian Self-Determination Act (P.L. 93-368), including direct contracting as a delivery mechanism for education.

IV. Make recommendations for modifications which will improve existing legislative and administrative procedures.

FINAL PRODUCT:

The Committee will develop for Council review and adoption an interim report highlighting the federal structure which provides educational services to American Indian children through the public school system as well as through the Bureau of Indian Affairs. Legislative and administrative actions will be recommended to promote the improvement of this area of education as deemed appropriate.

AREAS OF EMPHASIS:

I. Examination of legislative framework established to educate American Indians.

Council Activities:

A. Review of current legislation including:

a. Indian Self-Determination Act
b. Indian Education Act of 1972
c. Johnson O'Malley Act
d. Title I, Title VII, ESEA
e. P.L. 874 (Federally-owned land)
f. Snyder Act (construction)

B. Review areas which overlap; examine coordination possibilities between HEW Office of Indian Education and the Bureau of Indian Affairs.

C. Review problems encountered by BIA, HEW, State and local educational agencies in administering present laws.

D. Attend briefings with administration, agency and congressional personnel involved in this administration.

E. Develop specific testimony for the Chairman for any hearings associated with Indian education as deemed appropriate by the Council.

F. Formulate specific recommendations for legislative and administrative changes in these areas.

Staff Activities:

A. Prepare committee briefings of current legislative initiatives affecting Indian education.

B. Coordinate committee activities for soliciting views on present administration of various laws.

C. Coordinate seminars and format to discuss problems encountered by various agencies in administering these laws.

D. Identify overlapping areas in the current legislation for committee review.

E. Draft preliminary report on activities undertaken and information obtained.

F. Develop preliminary recommendations on coordination possibilities between agencies administering aspects of Indian education and other recommendations to facilitate program administration for review.

II. Examination of the various roles assigned to parents under current laws.

Council Activities:

A. Review staff briefing of parent role under current laws — advisory, sign-off authority, etc.

—Has local control encouraged under Indian Self-Determination Act aided community involvement in education of their children? Are stronger mechanisms for parent involvement under other legislative measures funded by the federal government desirable or necessary?

B. Discuss various roles assigned parents during site visits; during meetings with program officials.

C. Formulate recommendations for legislative and administration changes as deemed necessary.

Staff Activities:

A. Analyze current legislation affecting Indian education as to the roles set out for parent participation.

B. Develop questions for committee use on site visits during meetings with parents as to their role in their children's education.

C. Develop questions for committee use during seminars and/or other meetings with governmental officials administering parent aspects of legislation.

D. Draft preliminary recommendations for legislative and administrative changes to improve parent participation in their child's education.

III. Examination of Federal program relations with community interests.

PERIOD OF STUDY:

The Committee will undertake study activities and submit periodic reports to full Council from May 1977 through August 1977. Final interim report will be presented to Council in September 1977.

MIGRANT EDUCATION STUDY

OBJECTIVES:

I. To examine federal educational programs serving migrant children and proposed legislative and administrative modifications. To make recommendations for further improvements in the current system of services.

II. To identify common characteristics of effective migrant educational programs at the national, state and local levels.

III. To review materials regarding the Migrant Student Record Transfer System's effectiveness in providing necessary information on children at their next school location as quickly as possible, to prevent "lost" children, and loss of school credits from state to state.

IV. To examine the information compiled in the MSRTS on comparable achievement test data.

FINAL PRODUCT:

The Committee will develop for Council review and adoption a report highlighting the effectiveness of migrant education programs as well as areas requiring improvement. The Committee will recommend legislative and administrative actions to encourage the improvement of the services provided through federal educational assistance programs.

AREAS OF EMPHASIS:

I. Review of current federal programs serving migrant children and legislative and administrative proposals for modifications of the existing services.

Committee Activities:

A. Review staff briefing reports of current migrant education legislation and proposals.

B. Discuss with federal, state and local educational officials and program administrators the strengths and weaknesses of the current services and their opinions and comments on current proposed modifications.

Staff Activities:

A. Prepare Committee review briefing on migrant education and proposed modifications.

B. Undertake activities to solicit federal, state and local educational official's comments on the strengths and weaknesses of the current services provided and their reactions to the proposed modifications.

C. Plan appropriate Committee meetings with federal, state and local educational officials.

D. Prepare Committee discussion paper of issues identified and information to be obtained of Committee report.

II. Examination of Migrant Student Record Transfer System.

Committee Activities:

A. Review and comment on staff briefing on the operation of the MSRTS and the adequacy of the system in providing local districts with timely and complete information necessary for the effective delivery of necessary services.

B. Review staff briefing on the comparable test data used in the MSRTS.

C. Comment on the effectiveness of the MSRTS and propose draft recommendations for improvement in the system.

Staff Activities:

A. Prepare committee briefings on MSRTS.

B. Undertake information gathering activities necessary for Committee identification of the strengths and weaknesses and proposed modifications of the MSRTS.

C. Note Committee member comments and suggested areas for further committee focus. Prepare or plan appropriate activities for the collection of necessary information on areas identified by the Committee.

III. Identification of effective common characteristics of migrant educational programs at the national, state and local levels.

Committee Activities:

A. Undertake site observations of migrant educational programs and meet with appropriate educational personnel associated with the programs visited.

B. Provide staff with comments and draft recommendations based on site visited.

C. Review and modify staff site visit reports.

Staff Activities:

A. Undertake all planning activities associated with the Committee site visit activities.

B. Meet with regional, state and local educational officials to discuss areas of study concentration.

C. Prepare appropriate information gathering forms and obtain all necessary information.

D. Note Committee member comments and preliminary recommendations.

E. Participate in all site visit activities.

F. Prepare for Committee review and approval site visit reports of each site visited.

G. Prepare summary of site visit activities and information obtained. Highlight common characteristics of effective practices employed in sites visited and areas of strength and weakness in services. Prepare draft Committee recommendations based on comments and preliminary recommendations.

IV. Prepare interim report on federal migrant education programs.

Committee Activities:

A. Review draft reports highlighting the strengths and weaknesses of current federal services for migrant children and areas of concern with appropriate Committee recommendations for improvement.

B. Provide staff guidance for modification of report to meet Committee standards.

C. Adopt report as Committee product and submit to full Council for review and adoption.

Staff Activities:

A. Prepare draft interim report for Committee.

B. Note modifications suggested by the Committee and prepare final draft.

PERIOD OF STUDY:

Committee on Migrant Education will submit a final draft report for Council approval in November 1977.

1978 ANNUAL REPORT YEAR COUNCIL ACTIVITIES

EVENT	APRIL	MAY	JUNE	JULY	AUGUST	SEPT.	OCT.	NOV.	DEC.	JAN.	FEB.	MA.
FULL COUNCIL MEETINGS	CALIF.	D.C.	APPALACHIAN STATES: (Ky., Tenn., Georgia, Ark., Alabama)	NEW ENGLAND STATES: (Conn., VT., Mass., NH., RI., Maine)	NONE	D.C.	D.C.	D.C.	D.C.	D.C.	D.C.	D.C.
COMMITTEE MEETINGS		Indian Ed. Comm.										
*CONFERENCES	Florida Child Dev. Ohio Parent	D.C Parent										
SEMINARS		Indian Ed.				Adm. & Legis.						
ADVISORY POLICY PANEL MEETINGS												
NACEDC REPORTS												
SPECIAL						INDIAN ED.		MIGR.		SUC. PROG & PARENT		
INTERIM												
ANNUAL								AN. RPT. OUTLINE		FIRST DRAFT	SEC. DRAFT	EDIT

**(see following pages for upcoming conferences.)

SITE VISITATIONS JUNE--JULY 1977

Date	Location	Event
June 1-3	Berea, Kentucky	Conference on "The State of the Child in Appalachia-1977"

Purpose: To bring together a variety of persons from the private and public sector who are involved in the planning or the delivery of services to children in the Appalachian region. Observations will be made on programs that work, barriers that prohibit a smooth delivery of services and discussions will be had on methods of coordination to improve the quality of life for families in the Appalachian region.

Date	Location	Event
June 10-11	Appalachian Region	Site Visits to various Appalachian States

Purpose: To study rural issues in compensatory education in energy rich areas--Appalachia--Kentucky, Alabama, Tennessee, Georgia, Arkansas.

Participating Council Members: Members will be divided into several groups (utilizing one staff person when required) to cover the above states. A regular Council meeting will be held in Atlanta, Georgia on Saturday, June 11th.

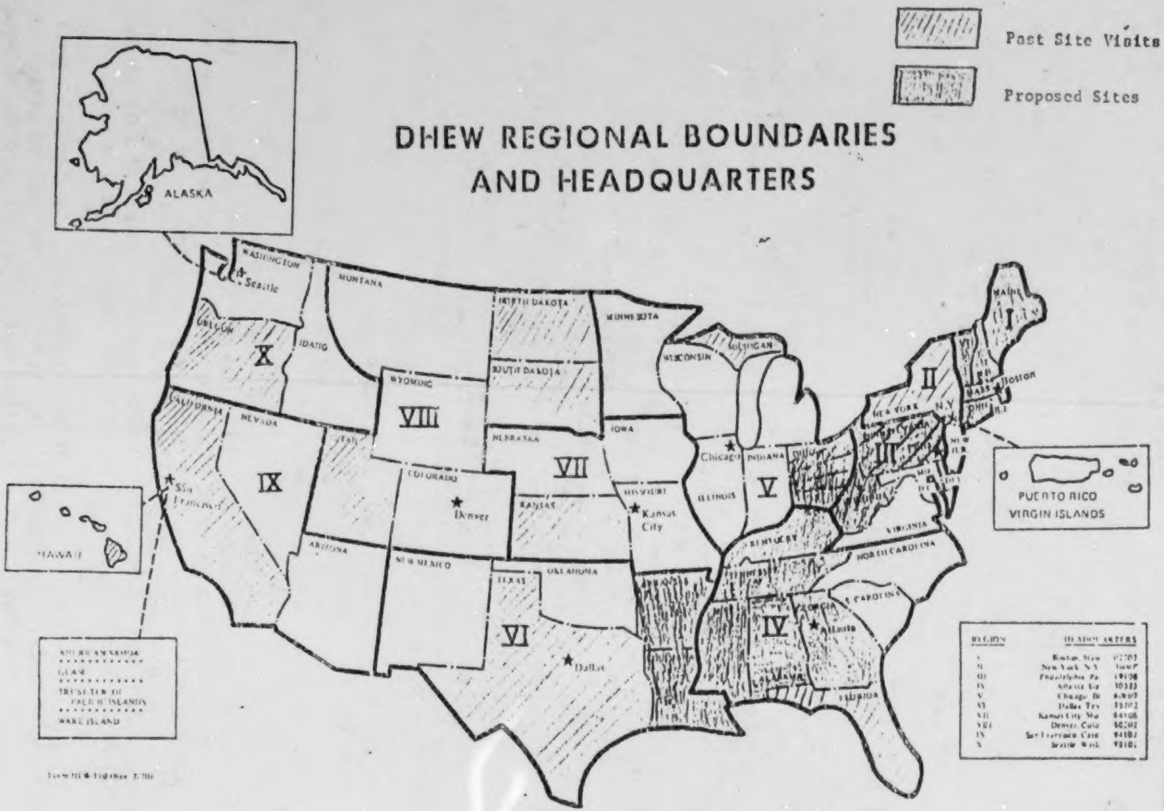
Date	Location	Event
July 11	Mississippi	Site Visit

Purpose: To study rural issues in compensatory education in day care/early childhood programs.

Date	Location	Event
July 15-16	Bangor, Maine Providence, Rhode Island Boston, Massachusetts	Informal hearings with state and local officials and parents and other interested parties.

Purpose: To gather candid comments and recommendations from its scheduled speakers regarding ESEA Title I and other federal educational programs serving educationally disadvantaged children in preparation for testimony before the House Subcommittee on Elementary, Secondary, and Vocational Education in Fall, 1977.

Participating Council Members: Members will be divided into several groups (utilizing staff as required) to cover the hearings in the above states. A regular Council meeting will be held in Boston, Massachusetts on Saturday, July 16th.



DHEW REGIONAL BOUNDARIES AND HEADQUARTERS

▨ Past Site Visits
▩ Proposed Sites
ALASKA
HAWAII
PUERTO RICO
VIRGIN ISLANDS
AMERICAN SAMOA
GUAM
TRUST TER. OF PACIFIC ISLANDS
WAKE ISLAND
WASHINGTON
OREGON
IDAHO
MONTANA
WYOMING
NORTH DAKOTA
SOUTH DAKOTA
MINNESOTA
WISCONSIN
MICHIGAN
IOWA
NEBRASKA
CALIFORNIA
NEVADA
UTAH
COLORADO
KANSAS
MISSOURI
ILLINOIS
INDIANA
OHIO
ARIZONA
NEW MEXICO
TEXAS
OKLAHOMA
KENTUCKY
VIRGINIA
NORTH CAROLINA
S. CAROLINA
GEORGIA
FLORIDA
NEW YORK
MAINE
MASS.
N.J.
R.I.
N.Y.
Seattle
San Francisco
Denver
Kansas City
Chicago
Dallas
Atlanta
Boston
I
II
III
IV
V
VI
VII
VIII
IX
X
REGION
HEADQUARTERS
I Boston, Mass. 02203
II New York, N.Y. 10007
III Philadelphia, Pa. 19108
IV Atlanta, Ga. 30323
V Chicago, Ill. 60607
VI Dallas, Tex. 75202
VII Kansas City, Mo. 64106
VIII Denver, Colo. 80202
IX San Francisco, Calif. 94102
X Seattle, Wash. 98101

Dr. Lewis. When you return from your work period, two proposals will have been presented to reduce the number of advisory committees.

One will be contained in the Commissioner's Annual Report, and the other will be sent to the House Government Operations Committee as a part of the reorganization plan. Congress will then have 90 days in which to act.

This hearing, we would hope, will give you the necessary data to respond to these initiatives. As one of the 38 statutory presidential advisory committees funded by the Federal Government, our committee's activities reflect the statutes which govern us.

I might point out, for example, that we have had an active role in the National Institute of Education compensatory education study: have been actively involved in the Berrara versus Wheeler case; the bypass case dealing with problems of serving nonpublic schools in the State of Missouri, to name but just two activities.

Our council believes it is important to point out that broad community participation in the governance of education is a basic principle of American education.

The advisory committee system, of which our council is a part, has proven to be a successful vehicle for this participation at the Federal level. The NACEDC has assumed a role not originally in its statutory obligation to recommend legislation that will be more responsive to those chldren being served. Local and State community advice through formal and informal mechanisms contribute to the purposes, priorities and objectives of educational programs. The advisory council mechanism we believe serves the same purpose at the Federal level.

The NACEDC has been the focus for the complex constituency concerned with improving educational attainment for the educationally disadvantaged children enrolled in elementary and secondary schools. The diverse background of members and their selection from representative geographical regions have contributed to a group uniquely capable of objectively considering needed improvements in compensatory education.

The council has visited with many groups throughout the country, received testimony from administrators, teachers, students, parents, and other concerned citizens; has held hearings, held the first national meeting in Washington for parents of ESEA-Title I children, as well as for all of the State Title I coordinators in the country, and has operated as openly as possible to gather opinions and advice from those affected by the implementation of ESEA-Title I. Once determined, council recommendations are then presented to the appropriate officials for consideration and adoption. Literally hundreds of NACEDC recommendations have become part of law, policy, and practice.

The council is proud of this achievement. The NACEDC has experienced the necessity of bringing citizens' advice and priorities to bear on programs in which between 33 to 50 percent of the eligibles receive needed service. In view of this limited delivery to those in need, we believe citizens should be involved in these critical and difficult choices with respect to the priorities related to the utilization of resources.

This hearing, called to review administrative practices as well as the work of individual advisory committees, we believe is extremely important. We also believe that any consideration of the Congress to strengthen the effectiveness of advisory councils should include strong emphasis on, number one, a system of committing management implemented to EMB level, which provides a manual and series of training opportunities for newly established committees, to curtail the large waste of tax dollars during the start-up period as new councils.

Second, announced common criteria for evaluating advisory committee effectiveness agreed upon and implemented, the GAO study on advisory councils suggests the following four criteria, with which our council agrees:

First, the larger number of committee meetings, the more actively the council is pursuing its charge.

Second, the larger the support costs incurred, indicating commitment to the council.

Third, the age of a committee should create a red flag under the assumption that older commtitees may no longer be required.

Last, the number of reports and recommendations made and adopted indicate effectiveness.

The third general area involves the affected community in the determination of priorities and services as a basic principle of governance in American education and necessary linkage for effective public administration.

In closing, we appreciate very much the formal evaluation by this subcommittee, since we believe our work is dependent upon an effective system of advisory council management.

The committee has received several exhibits along with my statement which respond to the letter of invitation sent to the council. We would be happy to have the committee seek further information from our staff at any time. Telephone information and names of executive director and other personnel were submitted with the information to the committee at an earlier time.

Mr. KILDEE. Thank you for your testimony.

The next person on the panel is Mrs. Gwen Awsumb, Chairperson, National Advisory Council on Equality of Educational Opprotunity.

STATEMENT OF GWEN AWSUMB

Mrs. AWSUMB. Thank you.

I am Gwen Awsumb, Chairman of the National Advisory Council on Educational Opportunity. I have served on the council since it was established in January of 1973 and as its chairman since January of 1976.

In addition to this oral statement a written report, as you required, has been furnished for your information.

[Prepared statement of Mrs Gwen Awsumb follows:]

NATIONAL ADVISORY COUNCIL
ON EQUALITY OF EDUCATIONAL OPPORTUNITY
1325 G Street N.W. – Suite 710, Washington, D.C. 20005

Testimony

Submitted to

Subcommittee on Elementary, Secondary, and Vocational Education
Committee on Education and Labor
U.S. House of Representatives

by

Mrs. Gwen Awsumb
Chairman
National Advisory Council
on Equality of Educational Opportunity

August 4, 1977

The Committee realizes that the operational aspects of an advisory council are not only shaped by the specific Congressional mandates given to it, but by the very nature of the educational program to which it is attached, the amount of its funding, state and local constituencies, and the structure and personalities of the regulatory agency to which it must rely upon for services.

NACEEO's Congressional mandate sets forth its duties and responsibilities as follows:

> "(1) advise the Assistant Secretary with respect to the operation of the Emergency School Aid Act programs, including the preparation of regulations and the development of criteria for the approval of applications;
>
> (2) review the operations of the program; (A) with respect to its effectiveness in achieving its purpose as stated in Section 702(b); and (B) with respect to the Assistant Secretary's conduct in the administration of the program;
>
> (3) meet not less than four times in the period during which the program is authorized and submit two interim reports, which reports shall include a statement of its activities and of any recommendations it may have with respect to the operation of the program, and;
>
> (4) submit to the Congress a final report on the operation of the program."

Congress created the Emergency School Aid Act (ESAA) in 1972 under P.L. 92-318, Title VII. The specific purposes of ESAA are as follows:

(1) To meet the special needs incident to the elimination of minority group segregation and discrimination among students and faculty in elementary and secondary schools;

(2) to encourage the voluntary elimination, reduction, or prevention of minority group isolation in elementary and secondary schools with substantial proportions of minority group students, and;

(3) to aid school children in overcoming the educational disadvantages of minority group isolation.

The law specifies several different types of programs. Assistance is available to both local educational agencies, state departments of education, and to public and private nonprofit organizations including institutions of higher education. The types of assistance and the percent of appropriations available for each are:

1. Basic grants for school districts	79%
Pilot projects (up to 15%)	
2. Grants to nonprofit organizations	8%
3. Bilingual/Bicultural	4%
4. Educational television	3%
5. Special programs (discretionary)	5%
6. National evaluation	1%

The overall Basic, Pilot, and Nonprofit appropriations are allocated on a statewide basis according to the number of minority children, 5-17, in the state, as compared to the number of such children in all states. Eligible applicants compete for program funds on an intra-state basis, the highest scoring client (according to procedures established by USOE) in the state under each category considered is given the first priority in the funding cycle. These programs are almost entirely administered through USOE's 10 regional offices.

The Bilingual, Educational Television, and Special programs, as well as the National Evaluations, are national competition programs entirely administered from Washington.

The entire ESAA program is made even more complex by the eligibility and compliance criteria required by almost every applicant. Local educational agencies, for example, may be eligible for a Basic grant if it is implementing:

1. A court ordered desegregation plan;
2. A plan approved by the U.S. Office of Civil Rights under Title VII of the Civil Rights Act;
3. A voluntary plan to eliminate or reduce minority group isolation in one or more of its schools;
4. A voluntary plan to prevent minority group isolation which is likely to occur in one or more of its schools;
5. A plan to enroll nonresident children in its schools to reduce minority group isolation;
6. For districts whose enrollment of minority group students exceeds 50% of the total, the establishment or maintenance of one or more integrated schools.

In addition to establishing eligibility, a school district must satisfy the U.S. Office of Civil Rights that they are not practicing discriminatory behavior as it pertains to staff, discipline, special educational assignment, transfer of property, national origin (language), as well as other types of more subtle discriminatory activity.

The activities for which school districts and nonprofit groups can request federal funds runs the entire spectrum from pre-school and drop-out prevention, to adult and career orientation programs.

ESAA is a complex and unique program which requires constant advisory oversight by a national council. Some of the additional unique features of ESAA are as follows:

1. ESAA is administered in a one to one relationship where the federal government deals directly with the individual applicants. State departments merely have a reviewing role.
2. Every ESAA applicant must establish a citizens advisory council that meets specific racial, parent, and civic requirements. In addition, multiracial student advisory councils are required when secondary schools are affected.
3. Public announcements of who are on the advisory committees is mandated.
4. An open general public meeting to discuss the proposed ESAA project is required.
5. ESAA districts must fill out all Civil Rights questionnaires, including the 101 and 102. They will be

the only districts required to submit the 101's and 102's for the 1977-1978 school year.

6. Is one of the few educational programs administered under both a full regional office management system as well as a national office.
7. Is the only educational program that requires proposal review and scoring by a bi-racial or multiracial, bi-sexual, nonfederal panel of desegregation experts.
8. Is one of the only programs that requires USOE to give all applicants a chance to resubmit their proposals if they do not qualify during the initial funding cycle.
9. Contains the requirement that local school districts applying for funds must certify that nonpublic schools desiring services under the provision of the statute are in compliance with OCR and are eligible to participate.
10. In 1972, was one of the few educational programs which mandated that a national evaluation be conducted on its effectiveness.
11. Is one of two educational programs administratively assigned to the Assistant Secretary of Education rather than to the Commissioner of Education.
12. Is one of the largest funded programs ($257 million in FY 1977).

Such a complex and unique program dealing with the most volatile issues in our national history (school desegregation, equality of opportunity, busing, faculty reassignment, and Civil Rights) requires all the attention, dedication, and corrective analysis that an advisory council and a regulatory agency can give.

Congress realized this when mandating that a Presidential council be established to oversee the program and its administration. To insure program success, Congress required the membership of NACEEO to be most unique.

NACEEO, aside from the Council on Indian Education, is the only Presidential council on education that requires by law that over fifty percent of its fifteen members be minority. The reasoning is clear in that seven specific minority groups are mentioned in the Act (Negro, American Indian, Spanish Surname American, Portuguese, Oriental, Alaskan Natives, and Hawaiian Natives).

The very nature of advisory councils precludes exclusive credit rights. NACEEO's formal, as well as informal, recommendations and influence cannot be accurately assessed without prejudice. We feel, quite honestly, that the Council has taken a leadership role and has not accepted a "passive rubber stamp" position to the agency, as is often the case with advisory councils. Regardless of the degree of cooperation NACEEO has received from the U.S. Office of Education, the Council has remained involved with every aspect of program operation and administration.

Some of the major accomplishments of the Council are as follows:

1. Produced four major reports containing recommendations on the operation of the ESAA program;
2. Held 19 full Council public meetings throughout the United States;
3. Held over 40 public Subcommittee meetings;
4. Performed over 50 site visitations to ESAA Basic, Pilot, and Nonprofit projects;
5. Performed six USOE regional office administrative reviews;
6. Made 20 site visits to State Departments of Education units involved in Civil Rights/EEO activities;
7. Members and staff participated in numerous conferences dealing with the issue of equal educational opportunity;

8. Produced six major papers concerning the unique needs of the specific minorities affected by the program;
9. Submitted over six position papers dealing with significant regulatory issues proposed by USOE;
10. Maintains an active mailing list of over 600 agencies and individuals to which NACEEO minutes and reports are sent. This includes sites in Alaska, Puerto Rico, and Hawaii.

The following specific recommendations contained in NACEEO reports have either resulted in action by the agency or have otherwise found support in similar recommendations by Congress or various educational organizations.

1973

1) That the Assistant Secretary determine the extent to which the public has sufficient time to advise her about proposed ESAA regulations, and in the event sufficient time does not exist, to suggest appropriate remedial action.

Former Secretary Mathews initiated an elaborate system to insure that the public have sufficient notification of HEW's intent to develop regulations. Congress has also stressed the importance of early involvement of citizens in having input in the development of regulations (Freedom of Information Act).

2) The Assistant Secretary evaluate carefully the structure and function of the panel review in the application process, and in the event that changes are deemed feasible, initiate the appropriate remedial action.

USOE changed the review panel composition to more closely comply with the criteria set forth in the HEW/OE Contracts and Grants Policy. Action has been initiated to insure that the same members that evaluate a proposal will review that proposal if resubmission is required.

3) That participants involved in evaluative research of the ESAA program comprise evaluation professionals from minority groups.

The USOE Office of Evaluation, in consort with System Development Corporation (primary contractor for ESAA state apportioned programs), implemented suggestions through the creation of a multiracial Evaluation Committee that has advisory oversight responsibility for the actual conduct of the evaluation.

1974

1) NACEEO recommends that the Assistant Secretary study carefully the types of programs that most effectively meet the diverse and specific needs of the seven racial and ethnic minorities named in the Act.

The Assistant Secretary supported the suggestion and referred it to the National Institute of Education (Ethnic Studies Unit). Several papers, small research, and a couple of conferences have centered on this issue.

2) NACEEO recommends that the Assistant Secretary determine the extent to which historical and sociocultural study units about racial and ethnic minorities are integrated into the public school curricula.

The Assistant Secretary referred the issue to NIE, and several surveys and small projects have been undertaken.

3) NACEEO suggests that the Assistant Secretary undertake a study to investigate the nature and type of relationship that exists between nonprofit organizations under ESAA and local educational agencies, and the impact of nonprofit organizations in attaining the purposes set forth in the law.

In early July of this year, 1977, the Assistant Secretary requested bids for a contract to evaluate nonprofit groups.

4) NACEEO recommends that knowledge gained from ESAA evaluations be used and disseminated appropriately. Proper procedures should be established to identify, validate, and translate exemplary practices.

In 1975, USOE established with NIE a joint dissemination unit which engages in promoting dissemination of exemplary projects under Title I, and plans to do the same for ESAA this year.

5) That the Assistant Secretary insure USOE does not require school districts to develop programs

entirely devoted to compensatory academic education activities. The various purposes and activities specified in the law should be addressed as well.

Congress, in its oversight hearings, mentioned the Council's advice when it also reminded the Office of Education that they were in error in requiring school districts to submit proposals focused on academic remediation. Congress also pointed out that USOE had failed to solicit and fund at least one prevention project.

6) NACEEO recommends that 3%, but not less than $13 million per annum, be set aside in the appropriations for "emergency needs" of local educational agencies.

USOE adopted an administrative provision whereby one-third of the Secretary's discretionary funds are reserved for emergency situations (districts applying for ESAA funds after the usual application date because of a final court decree or adoption of a voluntary plan by the school board.

Also, in 1974, NACEEO's Chairman, Dr. Dale Parnell, was instrumental in working with the Chief State School Officers Association in developing a policy statement on school desegregation and transportation, which was adopted by the Association.

1975

1) In pursuit of equal educational opportunity for our nation's children, Congress should establish and develop a procedure for determining national

educational goals and accountability. Congress should direct the National Institute of Education to develop, validate, and maintain national high school competency examinations, and to assist states in the administration and certification of such examinations.

At a recent oversight hearing of this Subcommittee, the Assistant Secretary for Education was instructed to pursue the issue of NIE developing a national competency examination.

2) Congress should increase its efforts to improve the quality of education for all students. Additional remedies for promoting quality education for all children must be pursued vigorously.

Senator Glen, along with Congressman Seiberling and Congressman Whalen, Jr., testified before this Subcommittee on behalf of their bills to amend the Emergency School Aid Act to include magnet schools, pairing, clustering, and neutral sites. Part of their testimony included reference to NACEEO recommendations and Congress did see fit to amend ESAA under P.L. 94-482 to include these additional activities.

3) Congress should promote effective cooperation between the U.S. Department of State and the Office of Education for the specific purpose of insuring adequate educational opportunities for immigrants and refugees, including, where necessary, provisions for bilingual education.

USOE supported our recommendation and through the efforts of the Administration and Congress, the Indo-Chinese Refugee Act was passed.

4) USOE should re-evaluate its ESAP program data with respect to the findings concerning Black male 10th grade students.

USOE did re-evaluate the data obtained by the contract evaluator, National Opinion Research Center, and the level of statistical significance was not totally substantiated upon reanalysis.

5) The National Institute of Education should disseminate widely public school desegregation and quality education models.

The NIE Educational Equity Group has several research projects under way dealing with successful desegregation models. USOE/EEO contracted with Educational Testing Service of New Jersey to conduct a study into successful practices in integrated schools. NIE has also sponsored several major conferences on school desegregation and integration.

1976

We realize that this is the year which the Subcommittee is primarily interested in obtaining data. Our 1976 report containing our recommendations, as well as a listing of our activities, was transmitted to the House Committee on Education and Labor on March 31, 1977, and again to the Subcommittee on Elementary, Secondary, and Vocational Education, in June, 1977, during its hearings on the ESAA program.

The major accomplishments of NACEEO during 1976 are as follows:

Two-day informational gathering meetings were held in Dallas, Texas, and Detroit, Michigan. The Legislative Subcommittee heard testimony from

ESAA consumers from throughout the southwest and northcentral United States. Over thirty ESAA consumers discussed their concerns and recommendations before the four-member group.

On-site visitations were made for the first time to Special ESAA Projects. This included programs dealing with art, special mathematics, educational television, and bilingual-bicultural programs. The five-member task force, in teams of two, visited over twenty-five projects.

Produced and distributed over 750 copies of our 1976 report. Produced and distributed over 500 copies of minutes for each of the Council or task force meetings.

Reviewed all major legislative proposals and regulatory changes that affected the program, offering NACEEO position in each case.

Staff Director participated in bimonthly meetings with the Associate Commissioner for Equal Educational Opportunities.

Council members participated as speakers in several major conferences, including the Region IX ESAA Project Directors Conference and NIE conference on law and educational policies.

Pointed out the lack of accountability for programs funded by USOE under Title IV, Civil Rights Act (Civil Rights advisory specialists and planning) and the duplication of effort. This same conclusion was later supported by a study funded by USOE.

NACEEO recommended that USOE undertake an evaluation of the educational television programs supported by ESAA. USOE has formally requested contractors to submit bids for research in this area.

We restated our 1975 recommendation that nonprofit group activity be evaluated. USOE, in June of this year, contracted out to a major university for research on nonprofit groups under ESAA.

The Council recommended an evaluation of the entire management of ESAA, especially the regional offices. USOE has requested proposals from contractors to review the operation of the program.

The Council stated in 1973, and again in 1976, that under the ESAA national evaluation design, many sensitive issues would not be subject to verification because of the sampling technique. In 1976, as a result of the NACEEO Evaluation Task Force, the System Development Corporation developed a special nontechnical report to accompany its data analysis volumes. The same report pointed out clearly for the first time the shortcomings as previously predicted by NACEEO.

The Executive Director of NACEEO participated in three meetings with all other executive directors of educational councils in order to improve communication, avoid duplication, and establish areas of mutual program activity goals.

Throughout 1976, as in 1975, NACEEO complied with all requirements of the U.S. Office of Education's Committee Management division. Activities solely directed to meeting agency demands has significantly increased compulsory attendance at USOE meetings, as well as submitting additional reports, budget requests and accountability documentation, which has required more and more staff time. USOE policy and administrative regulations, combined with the Freedom of Information provisions, has doubled the time alone for holding any type of Council meeting, task force meeting, or mere work sessions.

NACEEO feels it has just scratched the surface of this complex program. We have not reviewed every phase of the program, but have always had long range, broad work plans. Until the passage of P.L. 94-482, the Council operated on a year-to-year basis because of the termination dates specified in the Act. This created a forced-choice selection on the membership as far as prioritizing work goals with projected accomplishments within the given time frame. With a termination date commensurate with the legislative program authority, NACEEO has more flexibility in initiating projects and surveys over a more extensive span of time and a broader sampling base.

FY 1976 Budget Data

In relation to the budget information requested, we would like to call the Subcommittee's attention to the fact that the fiscal year in question was one that was extended three months because of the change to the new October 1-September 30 fiscal year. Our original budget for the 12-month fiscal year was $165,600. USOE developed a prorated formula for all councils under their jurisdiction in order to provide services during the transitional period. Therefore, the following data pertains to the 15-month period begining July 1, 1975, and ending September 30, 1976.

A) Budget for Council, including a breakdown of expenditures by purpose:

Appropriation: $205,500.00

Total expenditures: $198,637.92

11.11	Base Pay - Full Time Civilian	$ 65,761.73
11.1F	Administrative Leave - Civilian	2,298.08
11.15	Sick Leave	200.12
11.16	Normal Leave	1,311.52
11.3A	Base Pay - Part Time Civilian	1,665.60
11.3J	LSLP (Lump Sum Leave Payment)	6,565.30
11.37	Base Pay - WAE Consultant	34,500.00
11.51	Overtime Pay	2,319.16
11.54	Holiday Pay	51.84
12.11	CSRA (Retirement)	4,784.01
12.12	FICA (Federal Insurance Contributions Act)	2,115.69
12.14	FEGLI (Life Insurance	318.80
12.17	FEHBA (Health Benefits	745.15
21.20	Travel	57,343.60
23.31	Rental of Photocopier	1,175.50
23.43	Miscellaneous Rentals	450.06
24.11	Printing and Binding (GPO)	983.00
24.1A	Printing and Binding - Contract Field Printing	1,553.00
24.1R	Printing and Binding - Other	135.00
25.33	Management Studies, Evaluations, etc.	2,300.00
25.34	Conferences, Workshops	446.72
25.7A	Repairs to Office Equipment	163.00
25.9K	Central Payrolling Charges	356.85
26.6A	Magnetic Tape	37.56
26.6L	Office Supplies	3,771.09
26.6M	Subscriptions, Pamphlets, Documents	819.70
26.81	Paper Stock for Printing and Printing Supplies	92.10

31.21	Desks, Tables and Chairs	1,565.84
31.31	Typewriters	2,079.00
31.3A	Other Office Machines	1.014.15
31.5N	Audio, Visual, and Photographic	1,364.90
31.81	Books	349.85
	Total Expenditures	$198,637.92

B) The number of, and expenditures for, personnel:

32 pay periods, including 26 regular pay periods and 6 pay periods for transitional quarter

Council Members: Mrs. Gwen Awsumb - 32 pay periods
Mrs. June Cameron - 32 pay periods
Mr. Loftus Carson - 32 pay periods
Dr. T. Winston Cole - 32 pay periods
Dr. Lawrence Davenport - 32 pay periods
Dr. Jacquelyne Jackson - 32 pay periods
Mr. Jackson Lee - 32 pay periods
Mr. Alfred McElroy - 6 pay periods (appt. 6-24-76)
Mr. Edward Meyers - 32 pay periods
Dr. Haruko Morita - 32 pay periods
Dr. Frederick Mosteller - 32 pay periods
Dr. Richard Pesqueira - 28 pay periods (resigned 8-1-76)
Dr. Dale Parnell - 10 pay periods (resigned 11-29-75)
Mr. Lyman Pierce - 32 pay periods
Miss Carmen Rodriguez - 32 pay periods
Mrs. Sally Stempinski 6 pay periods (appt. 6-24-76)

Staff: W. G. Fuller, former Executive Director - 4 pay periods
Agnes Mussmecher, former Admin. Assistant - 4 pay periods
Nancy Rowinski, former Secretary - 6 pay periods
Leo Lorenzo, Executive Director - 28 pay periods
Rosemarie Maynez, Admin. Assistant - 27 pay periods
Deborah Linderman, Secretary - 17 pay periods

Expenditures - Personnel and Benefits:

11.11	Base Pay - Full Time Civilian	$65,761.73	
11.1F	Administrative Leave - Civilian	2,298.08	
11.15	Sick Leave	200.12	
11.16	Normal Leave	1,311.52	
11.3A	Base Pay - Part Time Civilian	1,665.60	
11.3J	LSLP (Lump Sum Leave Payment)	6,565.30	
11.37	Base Pay - WAE Consultant	34,500.00	
11.51	Overtime Pay	2,319.16	
11.54	Holiday Pay	51.84	
			$114,673.35

12.11	CSRA (Retirement)	$4,784.01	
12.12	FICA (Fed. Ins. Cont. Act)	2,115.69	
12.14	FEGLI (Life Insurance)	318.80	
12.17	FEHBA (Health Benefits	745.15	
25.9K	Central Payrolling Charge	356.85	
			8,320.50
	Total Personnel Compensation and Benefits		$122,993.85

C) **Expenditures for Travel:** $57,343.60

Figure includes transportation and per diem which ranges from a minimum of $33.00 per day to a maximum of $50.00 per day.

D) The number of meetings and expenditures connected with meeting:

1) Full Council; Washington, D.C.; October 3-4, 1976

$2,600.00	Compensation
152.10	FICA
23.79	Central Payroll Charge
3,517.53	Travel
180.38	Rental of Conference Facilities
$6,473.80	Total

2) Legislative Subcomm. and Special Projects Subcomm.; January 15, 1976
Full Council; January 16-17, 1976
San Francisco, California

$ 3,600.00	Compensation
210.60	FICA
23.79	Central Payroll Charge
7,697.49	Travel
217.68	Rental of Conference Facilities
$11,769.56	Total

3) Executive Committee; Washington, D.C.; February 27, 1976

$ 300.00	Compensation
17.55	FICA
5.49	Central Payroll Charge
815.65	Travel
$1,138.69	Total

4) Full Council; Atlanta, Georgia; May 26-28, 1976

$2,800.00	Compensation
163.80	FICA
20.13	Central Payroll Charge
4,494.95	Travel
421.38	Rental of Conference Facilities
$7,900.26	Total

5) Legislative Subcommittee; Dallas, Texas; June 17-18, 1976

$ 600.00	Compensation
35.10	FICA
5.49	Central Payroll Charge
1,717.04	Travel
$2,357.63	Total

6) Legislative Subcommittee; Detroit, Michigan; June 28-29, 1976

$ 600.00	Compensation
35.10	FICA
5.49	Central Payroll Charge
1,195.70	Travel
$1,836.29	Total

7) Full Council; Alexandria, Virginia; September 24-25, 1976

$2,700.00	Compensation
157.95	FICA
25.62	Central Payroll Charge
3,830.78	Travel
250.00	Rental of Conference Facilities
$6,964.35	

Total expenditures for meetings: $38,440.58

# # #

Mrs. Awsumb. The Emergency School Aid Act passed by the Congress in 1972 provides financial assistance to minimize the problems attendant to public school desegretation. The funds are to be used to reduce minority group isolation and to aid school children in overcoming the disadvantages of such isolation.

In order to monitor the achievement of these goals, the Act mandated that our council of 15 members be established to advise in the area of the criteria that regulated the applications for grants under this program; to review the effectiveness of the program; submit to the Congress periodic reports of our activiites, including any recommendations for changes, and a final report on the operation of the program.

The majority of our members are from minority groups. The sexes are fairly evenly represented. There is a wide range in ages on the council, and there is a good solid geographic distribution.

All members are not educators in the strictest sense, but all represent a facet of the growing educational concern in this country and have faced its problems at some local level. Included are four members involved at the university level, an elementary school principal, a school superintendent, a classroom teacher, a law student, a school board member, an attorney, a businessman, two working in the field of human relations, and two former elected officials serving at the local level.

We have been an active council and have taken our responsibility seriously. Ours has been a unique role in the rapidly changing world of public education. We have made site visitations to observe how the funds are being used and to listen to reactions of those involved in administering them.

We have invited experts in this field to share with us their experiences in dealing with the complex subject of school desegregation. We have researched published material and we have even attempted to evaluate the evaluations made by the Office of Education. This has resulted in definitive recommendations on the handling of these funds, which you will find in the written report. It has also resulted in the surfacing of related concerns which I wish to share with you.

Our public schools reflect the current ills of our present-day society. Discipline is almost nonexistent, excellence is considered an old-fashioned goal, teaching is hampered by parental attitudes that range from apathy to outright hostility. Support for public education is at an all-time low, a condition more related to students' safety and the quality of education being offered in schools today than to the presence of minority groups within those schools.

In too many instances standards have been lowered to accommodate underachievers rather than instituting remedial programs to cure people from the disease inflicted by minority isolation. Federal funds continue to be needed in order to address these many problems that are interrelated with desegregation because the erosion of local school dollars has become critical in most communities.

In order to restore confidence in the public system, the schools must find a way to lure the teaching staff it needs to offer a quality product and guarantee the security of an appropriate atmosphere for learning by students who are encouraged to respond by their parents. This requires the combined efforts of local officials, minority leadership, administrators and dedicated community participation, but such efforts must be supported with sufficient funds to implement programs necessary to regain a level of academic excellence and structural discipline without sacrificing the gains made in our desegregation efforts.

As a nation we must be held accountable if the equal opportunity we now offer educationally does not measure up to the best we can do for our young people. Of what benefit is a unified system if it cannot properly prepare its pupils to live and work properly in today's demanding world. We continue to have an emergency, but it is one that encompasses more than desegregation. At stake is the quality of education being offered in public schools. What we do about it today could well determine the future strength of our nation for tomorrow's generations.

Thank you.

Thank you, Mr. Chairman.

Mr. KILDEE. Thank you.

Our next member of the panel is Mr. Thomas A. Thompson, Chairperson, National Advisory Council on Indian Education.

STATEMENT OF THOMAS A. THOMPSON

Mr. THOMPSON. Thank you, Mr. Kildee.

My name is Tom Thompson, Chairman of the National Advisory Council on Indian Education, and before I continue I would like to intorduce our Executive Director, Mr. Stuart Tonoma.

Would you stand, please?

Mr. KILDEE. Welcome to the committee this morning.

[Prepared statement of Thomas Thompson follows:]

Statement by

Thomas A. Thompson
Chairperson

The National Advisory Council on Indian Education

Before

The House Committee on Education and Labor
Subcommittee on Elementary, Secondary, and Vocational Education

August 4, 1977

My name is Thomas A. Thompson, Chairperson, of the National Advisory Council on Indian Education (NACIE). I would like to express my appreciation to the Chairman and Subcommittee for allowing me to present testimony on behalf of the Council.

I will respond to the six topics as listed in the letter from Congressman Perkins:

I. Duties & responsibilities of the National Advisory Council on Indian Education. The Council was chartered under the authority of Title IV, Section 442 of the Education Amendments of 1972 (P.L. 92-318) (20 U.S.C. 1221g). The responsibilities of the Council as mandated by these laws are:

1. submit to the Commissioner of Education a list of nominees for the position of Deputy Commissioner of the Office of Indian Education.

2. advise the Commissioner of Education with respect to the administration (including the development of regulations and of administrative practices and policies) of any program in which Indian children or adults participate from which they can benefit, including Title III of the Act of September 30, 1950 (P.L. 81-874) and Section 810, Title VIII of the Elementary and Secondary Education Act of 1965 (as added by Title IV of P.L. 92-318 and amended by P.L. 93-380), and with respect to adequate funding thereof;

3. review applications for assistance under Title III of the Act of September 30, 1950 (P.L. 81-874), Section 810 of Title VIII of the Elementary and Secondary Education Act of 1965 as amended and Section 314 of the Adult Education Act (as added by Title IV of P.L. 92-318), and make recommendations to the Commissioner with respect to their approval;

4. evaluate programs and projects carried out under any program of the Department of Health, Education, and Welfare in which Indian children or adults can participate or from which they can benefit, and disseminate the results of such evaluations;

5. provide technical assistance to local educational agencies and to Indian educational agencies, institutions, and organizations to assist them in improving the education of Indian children;

6. assist the Commissioner in developing criteria and regulations for the administration and evaluation of grants made under

Section 303(b) of the Act of September 30, 1950 (P.L. 81-874) as added by Title IV, Part A, of P.L. 92-318; and

7. submit to the Congress not later than March 31 of each year a report on its activities, which shall include any recommendations it may deem necessary for the improvement of Federal education programs in which Indian children and adults participate or from which they can benefit, which report shall include a statement of the Council's recommendations to the Commissioner with respect to the funding of any such programs;

8. be consulted by the Commissioner of Education regarding the definition of the term "Indian," as follows:

> Sec. 453 /Title IV, P.L. 92-318/. For the purposes of this title, the term "Indian" means any individual who (1) is a member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree, of any such member, or (2) is considered by the Secretary of the Interior to be an Indian for any purpose, or (3) is an Eskimo or Aleut or other Alaska Native, or (4) is determined to be an Indian under regulations promulgated by the Commissioner, after consultation with the National Advisory Council on Indian Education, which regulations shall further define the term "Indian."

In addition to these mandated responsibilities, the Council imposes further responsibilities on itself. On behalf of Indian people throughout the United States, the NACIE is committed to:

1. improving educational standards for all Indians and Alaska Natives;
2. encouraging and fostering the ideal of Indian self-determination by participation in the policy making process of the Office of Indian Education (OIE) and advising the Commissioner of Education on other programs within the Office of Education (OE), and the Department of Health, Education, and Welfare (HEW);
3. serving as an advocate and as a liaison for American Indians and Alaska Natives on educational issues before the Congress, the Administration, the OE, and the HEW; and
4. aiding the American Indian and Alaska Native community in participating in the American educational system on their terms as well as on the terms of the larger American society.

These additional responsibilities have evolved over the years of the Council's existence and as the needs of Indian education have increased.

II. Budget

The following budget gives a breakdown of expenditures for FY'76. In FY'76 the Council had a total of $287,500.00 (including the Transition Quarter) on which to operate. The expenditures by purpose were:

	FY'76
PERSONNEL	
Salaries	$92.454.04
Benefits 9.1%	8,299.17
TOTAL	$100,753.21
COUNCIL MEMBERS	
Compensation	$51,700.00
Benefits 5.85%	3,024.45
TOTAL	$54,724.45
NACIE CONSULTANTS	
Compensation	$20,904.72
Benefits 5.85%	1,222.93
TOTAL	$22,127.65
TRAVEL & PER DIEM	
Council Members	$61,502.20
Invitational	1,507.71
Staff	14,648.18
TOTAL	$77,658.09
ANNUAL REPORT	$ 7,622.00
OTHER PRINTING	$ 2,187.08
CONTRACTS	$ 1,009.70
OTHER COSTS	
Supplies, Materials, Payroll Charges, Meeting expenses, Equipment lease, etc.	$11,980.02
TOTAL	$287.062.20

The FY'77 appropriation for the NACIE was $100,000, a 56 percent reduction from the FY'76 appropriation. There was a reprogramming of $37,500 from the OIE to the NACIE, with Congressional approval, for the NACIE's proposal review to submit a slate of recommendations to the Commissioner of Education.

FY'77

PERSONNEL	
Salaries	$71,980.99
Benefits 9.5%	6,797.36
TOTAL	$78,778.35
COUNCIL MEMBERS	
Compensation	$22,600.00
Benefits 5.85%	1,322.10
TOTAL	$23,922.10
NACIE CONSULTANTS	
Compensation	$1,000.00
Benefits 5.85%	58.50
TOTAL	$1,058.50
TRAVEL & PER DIEM	
Council Members	$14,100.00
Staff	2,000.00
TOTAL	
ANNUAL REPORT	$ 3,600.00
OTHER COSTS	
Supplies, Materials, Payroll Charges, Meeting expenses, equipment leases, etc.	$14,041.05
TOTAL	$137,500.00

The Appropriation Subcommittee's conference report did not give any indication of the reasons for reducing the Council's appropriation. Regardless, the Council has attempted to fulfill its mandated responsibilities on the $137,500 budget. The Council's minimum operating budget is $260,000. This figure would allow the Council:

1. to maintain a staff of four;
2. to meet in full session quarterly in Indian populated areas;
3. to conduct a minimum of 60 on-site visits; and
4. to adequately maintain the Council headquarters in Washington, D.C.

III. Personnel

	FY'76 7/1/75-9/30/76 (15 months)	FY'77 10/1/76-9/30/77 (12 months)
Executive Director	$42,460.64	$44,422.00
Associate Executive Director	$30,703.92	$ 5,039.00
Administrative Assistant	$ 9,377.62	$11,607.00
Steno/Receptionist	$ 8,156.08	$10,483.00
Student Aid	$ 780.00	-0-
Overtime	$ 975.78	$ 429.99
Subtotal	$92,454.04	$71,980.99
Benefits	$ 8,299.17	$ 6,797.36
TOTAL	$100,753.21	$78,778.35

IV. Travel & Per Diem

Travel in FY'77 expenditures to date.

	FY'76 7/1/75-9/30/76 (15 months)	FY'77 10/1/76-9/30/77 (12 months)
Full Council Meetings (Seven meetings were held in FY'76 and one in FY'77)		
Compensation	$26,500.00	$22,600.00*
Travel	$32,132.41	$ 7,592.59
Meeting Facilities	$ 1,864.27	-0-
Subtotal	$60,496.68	$30,192.59
Subcommittee Meetings		
Compensation	$ 9,900.00	-0-
Travel	$14,351.29	-0-
Subtotal	$24,251.29	
On-Site Visits, Conferences		
Compensation	$13,500.00	-0-
Travel	$13,264.59	-0-
Subtotal	$26,764.59	
Other Council Business		
Compensation	$1,800.00	$ 300.00
Travel	$1,753.91	$ 564.00
Subtotal	$3,553.91	$ 864.00
Staff Travel		
Travel	$13,487.97	$ 598.19
Invitational Travel	$ 1,507.71	-0-
Taxi (Local Travel)	$ 1,160.21	$ 651.45
Subtotal	$16,155.89	$ 1,249.64
TOTAL	$131,222.36	$32,306.23

* Proposal Review @$25.00 per proposal.

V. Accomplishments of the National Advisory Council on Indian Education.

1. The Council has, over the years, served as an advocate for Indian people concerning educational issues. These concerns of Indian people have been relayed by the Council via testimony before the Senate and House Appropriations Subcommittees, the House Committee on Education and Labor, the Senate Select Committee on Indian Affairs, etc. The Council has also communicated Indian educational concerns with the HEW, the OE, the OIE, and other OE offices (bilingual education, post-secondary education, vocational education, etc.), the White House, and the Office of Management and Budget (OMB). The Council has held full Council meetings in Indian populated areas, and has set aside one full day of each three day meeting for public testimony. These presentations are an important aspect of each meeting. These public hearings serve as a vital link for the Council to become aware of some of the educational concerns of Indian people. The testimony presented by public witnesses have resulted in action by the Council via resolutions and recommendations to the appropriate agencies, organizations or individuals.
2. In FY'76 the Council initiated a search for nominees for the position of Deputy Commissioner of the OIE. This was a priority of the Council. The search produced a list of highly qualified candidates six of whom were interviewed by the Council. The list was narrowed to three candidates whose names were forwarded to the Commissioner of Education, Dr. Ernest L. Boyer, for his consideration for appointment as Deputy Commissioner of the OIE. Those names forwarded were: Dr. Gerald E. Gipp, Standing Rock

Sioux, Assistant Professor at the Pennsylvania State University; Mr. Leroy Clifford, Pine Ridge Sioux, Program Analyst, Bureau of Indian Affairs (BIA); and Mr. Gerald Gray, Blackfeet, Superintendent of Schools, Box Elder, Montana. Commissioner Boyer's choice for Deputy Commissioner of OIE was Dr. Gerald E. Gipp. Dr. Gipp was appointed June 23, 1977, which coincided with the 5th Anniversary of the Indian Education Act.

3. The Council pursuant to fulfilling its statutory responsibilities, reviewed over 2600 applications for assistance under Title IV of the Indian Education Act and made recommendations on their approval for funding in FY'76. This proposal review process was again undertaken in FY'77 and a total of over 1800 applications were reviewed and recommendations for funding were made by the Council. The participation by the Council in the proposal review is one of its most important functions. Not only does this function serve as a monitoring activity, but it also serves to provide an opportunity for further Indian participation in the ideal of self-determination. The recommendations provide the Commissioner of Education with more information on which to base his decisions on projects to be funded by the OIE.
4. The Council has worked closely with the OIE in the development of rules and regulations that govern funding under the Indian Education Act. The Council's recommendations are submitted directly to the OE/OIE and reiterated in the Council's annual report. In addition, the Council has been consulted by other OE programs on rules and regulations (bilingual education, adult education, vocational education, etc.).

5. The Council in FY'76 made 37 on-site visits to Title IV projects. These visitations were mainly in response to requests from the projects soliciting the Council's help to resolve problems or to seek consultation on problems with the projects. These on-site visits were coordinated with the OIE to prevent any possible duplication of effort by either office. In FY'77 the Council's on-site visits by the Council were severely curtailed due to the lack of funds for this activity. The Council has a strong committment to provide technical assistance to the various programs funded under Title IV. The need for more funds to conduct this activity is apparent and the need also exists in the OIE to provide more needed technical assistance and monitoring of their programs. It is extremely important to the OIE to be able to monitor these programs to have some way to measure the sucesses of the programs. The OIE's staff of 46 have an exceptionally heavy workload and it is extremely difficult for them to effectively monitor each project, even if there were funds to do so they desperately need more program people. This is where the Council is helpful in augmenting the OIE's effort. Unfortunately, we have too little funds to do this, however, various Council members have volunteered their time to provide technical assistance to projects in their own areas and also attend meetings on behalf of the Council on their own or through their organizations/tribes and to serve as liaisons and advocates for the Indian people on the local, state, and national levels.
6. The Council has sumbitted an annual report each year of its existence. The annual report serves as the principal document of

the Council to convey their recommendations to the Congress, to the OE/DHEW, and to the Administration. The Fourth Annual Report to the U.S. Congress has been transmitted and final publication is due in the near future.

7. In March of this year the President, Office of Management and Budget, and the Secretary of the Department of Health, Education, and Welfare issued a memorandum and instructions concerning the annual comprehensive review of advisory committees.

> "The President instructed that all committees were to be recommended for continuation only if a compelling need could be demonstrated, if the committee conducted its business openly, and if a balanced membership on the committee were in fact the case. OMB's Circular A-63 further instructed that the evaluation of each committee must determine whether the committee was carrying out its functions, whether the functions could be revised, whether it could be merged with other groups, or lastly, whether the committee should be terminated. In addition, the review this year offered the citizenry opportunity to comment on the future of each committee according to the established criteria. Unlike many of HEW's advisory committees, OE's committees do not by law review grant applications. The single exception is the National Advisory Council on Indian Education."

The following is an extract of the OE's evaluation of the National Advisory Council on Indian Education. The Department recommended that the National Advisory Council on Indian Education be continued unchanged and stated:

> "The National Advisory Council on Indian Education (Tab N) is unique among OE's groups, in that it is the only grant-reviewing committee, making recommendations to the Deputy Commissioner for Indian Education, who is the final awarding official. The Council also has an unusual legislated responsibility to select the slate of candidates for the position of Deputy Commissioner for Indian Education, from which the Commissioner makes a selection. Another unique characteristic of the Council is that it is entirely composed of a minority population--Indians--as required by law. The members of the council represent tribes from across the entire country, including Alaska,

> urban and rural Indians, reservation and nonreservation Indians. Public participation in the Council meetings is outstanding, since the Council normally reserves up to one full day of its meetings for public presentations. Following the practice of varying its meeting locations in all geographic areas with significant Indian populations, opportunities otherwise not available have been afforded to Indian community members to give their views on education for Indian children and adults.
>
> "The recommendations of the Council have reflected the needs and desires of local Indian communities in education. Their recommendations have been incorporated into our regulations, program priorities, budget requests and the general administration of the Indian Education Act.
>
> "In view of the special historical relationship between the Indian tribes and the Federal Government and in accordance with the proposed Bureau-related structure and the established criteria, I recommend that the National Advisory Council on Indian Education be continued."

The review of advisory councils and recommendations from the OE were forwarded to the Department of Health, Education, and Welfare and its recommendation concurred with the OE to continue the National Advisory Council on Indian Education intact. The Department of Health, Education, and Welfare's recommendation is as follows:

> "Likewise, the National Advisory Council on Indian Education is unique among OE's groups, in that it is the only grant-reviewing committee, making recommendations to the Deputy Commissioner for Indian Education, who is the final awarding official. The Council also has an unusual legislated responsibility to select the slate of candidates for the position of Deputy Commissioner for Indian Education, from which the Commissioner makes a selection. Another unique characteristc of the Council is that it required by law. The members of the council represent tribes from across the entire country, including Alaska, urban and rural Indians, reservation and nonreservation Indians."

In conclusion, the NACIE has in its short lifetime attempted to fulfill its statutory responsibilities on as competent and professional a level as possible. The Congressional mandate is broad and for the NACIE to fully meet the mandate, additional funds are necessary. The current budget limitations imposed upon the NACIE allows a minimal functioning of the Council. The staff has been reduced to only three people, on-site visits have been reduced, overall office operations have been reduced, and the number of full Council meetings have been reduced. I understand that this Subcommittee and the full Committee on Education and Labor is an authorizing committee and not an appropriations committee, however, should in your review of the NACIE a decision be made to continue the Council, I hope that it would recommend increased funding for the Council. The adequate funding level being based on the budget outlines as presented in this testimony.

This concludes my testimony on behalf of the National Advisory Council on Indian Education. I will be glad to respond to any questions.

Mr. THOMPSON. The National Advisory Council on Indian Education includes 15 members, 5 of whom are women; the membership represents 14 States and 15 of the Indian tribes.

I would like to express my appreciation to the chairman and the subcommittee for allowing me to present testimony today on behalf of the council. I will respond to the 6 topics as listed in the letter from Mr. Perkins, and in doing so summarize the various components we feel should be highlighted.

In terms of the duties and responsibilities of the council, I feel that within the primary mandated responsibilities, of which there are 8, 2 of them bear special notice.

One, our council, to my knowledge, is the only council who is mandated with the responsibliity to review applications in all parts of the Indian Education Act, and this year, for example, we reviewed approximately 2,000 applications and subsequently made recommendations to the commissioner for the funding of those programs.

The second responsibility of our mandated 8, which also should be highlighted, is that our council submits to the Commissioner of Education a list of nominees for the position of Deputy Commissioner for the Office of Indian Education. The other responsibilities as mandated by the law range from technical assistance, in terms of local education agencies within the States, providing that technical assistance and advising the commissioner on all programs that have bearing on adult and younger Indian learners.

In addition to the mandated responsibilities that the council has by law, the council has imposed further responsibilities on itself and on behalf of Indian people throughout the country.

The NACIE is committed to improve educational standards for all American Indians and Alaskan natives, and encouraging and fostering the ideal of local self-determination. I think for several minorities, and the Indian people in particular, it has only been within the last decade that Indian people have been allowed to have an investment and an involvement in determining the educational destiny for their chldren. I think this bears note as well.

In terms of the second item in Congressman Perkins' letter, the budget: During fiscal year 1976, including the transition quarter, for a 15 months' period the council had a budget total of $187,500. The fiscal year 1977 appropriation for the NACIE was $100,000, a 56 percent reduction from the fiscal year 1976 appropriation. Within the last 60 days there has been reprogramming of $37,500 from the Office of Indian Education to the council with congressional approval for the NACIE proposal review process. So the fiscal 1977 budget has included $137,500.

I should note also that the Appropriations Committee, the appropriations conference report did not give any indication in terms of the reasons for reducing the council's appropriation but, regardless, the council has attempted to fulfill its mandated responsibilities on its budget of $137,500.

We feel that the council's minimum need in terms of a minimum operating budget is $260,000. This would adequately allow the council to maintain its staff. Currently the staff includes three people—it has traditionally been four—to meet in full session quarterly in Indian-populated areas and to conduct a minimum of 60 site visits. The Office of Indian Education with its staff of 46 in terms of the staff load, by project, is excessive, to say the least.

We feel that the council can offer a tremendous service to the Office of Indian Education and to the field as well by providing technical assistance. This year, for example, our budget has not allowed us to formally conduct on-site technical assistance. However, several of the members, in fact all of the members, have periodically at their own expense traveled throughout their own States giving technical assistance to tribes, local Indian parent committees, to local education agencies in terms of developing programs for the Indian Education Act.

I should also note that we have submitted for the record copies of our written testimony, and the budget is broken out in terms of expenditures, obligations for both fiscal 1976 and 1977.

In terms of the accomplishments of the National Advisory Council, I should also note that our council is relatively young, in terms of years of existence. Ten of our members have served for approximately 11 months, less than a year. I think our council is extremely diverse, not only in terms of its professional background by individuals, but also by its geographic distribution. The new membership, as its primary goal attempted this year to increase lines of communication, and hopefully strengthen the council's credibility with the Congress, the Office of Education, the department, with the Indian tribes, with educators and lay people throughout the country.

I feel that we have been extremely successful this year in terms of increasing that communication, especially with national Indian organizations, with the department, and with various members of the Congress.

Other accomplishments this year have included, as I mentioned earlier, the review of approximately 2,000 applications under the Indian Education Act. We also conducted during fiscal year 1976 and the first part of fiscal year 1977 the search for the deputy commissioner for the Bureau of Indian Education, and we received approximately 18 applciations; after a screening process 6 of those individuals were called in for interviews. We then submitted a list of three to Commissioner Boyer.

The names that were forwarded for his review were Dr. Gerald Gipp, who is a Standing Rock Sioux, and serves as professor at Pennsylvania State University; Mr. Leroy Clifford, of the Pine Ridge Sioux, program analyst with the Bureau of Indian Affairs here in Washington, D.C., and Mr. Gerald Gray, a fellow Blackfeet from Montana, who is Superintendent of Schools of Box Elder, Montana.

Commissioner Boyer's choice for deputy commissioner was Dr. Gerald Gipp. It should also be noted that Dr. Gipp was appointed on June 23, 1977. This date coincided with the fifth anniversary of the Indian Education Act.

As was mentioned in other testimony today, the Office of Management and Budget, the President, the secretary, the Department of Health, Education and Welfare, earlier this year issued a memorandum and instructions concerning the annual comprehensive review of advisory committees. The following is an extract of the Office of Education's evaluation of the National Advisory Council on Indian Education, and the department recommended that the National Advisory Council on Indian Education be continued unchanged, and stated:

> The National Advisory Council on Indian Education is unique among OE's groups in that it is the only grant-reviewing committee making recommendations to the Deputy Commissioner for Indian Education, who is the final awarding official. The council also has an unusual legislative responsibility to select the slate of candidates for the position of Deputy Commissioner for Indian Education from which the commissioner makes a selection.
>
> Another unique characteristic of the council is that it is entirely composed of a minority population, American Indians, Alaska natives, as required by law. The members of the council represent tribes from across the entire nation, including Alaska, urban and rural Indians, reservation and nonreservation Indians. Public participation in council meetings is outstanding since the council normally reserves up to one full day of its meetings for public presentations, following the practice of varying its meeting locations in all geographic areas with significant Indian populations. Opportunities otherwise not available have been afforded to Indian community members to give their views on education for Indian chldren and adults.
>
> The recommendations of the council have reflected the needs and desires of local Indian communities in education. Their recommendations have been incorporated into our regulations, program priorities, budget requests, and general administration of the Indian Education Act.
>
> In view of the special historic relationship between the Indian tribes and the Federal Government, and in accordance with the proposed bureau-related structure and the established criteria, I recommend that the National Advisory Council on Indian Education be continued.

From Commissioner Boyer's office, his recommendations went to the department level, and Secretary Califano also recommended that the council be continued.

In conclusion, the National Advisory Council on Indian Education in its short lifetime has attempted to fulfill all of its statutory repsonsibilities on as competent and professional a level as possible.

Our congressional mandate is broad. For the NACIE to fully meet that mandate, additional funds are extremely necessary.

The current budget limitations imposed by the NACIE allows only a minimal functioning of the council. The staff has been reduced to but 3 people, on-site visits have been limited, and the overall office operations have been reduced.

I understand that this subcommittee and the full Committee on Education and Labor is an authorizing committee and not an appropriations committeee. However, in our review of the NACIE, should a decision be made to continue the council, I would hope that it would recommend increased funding for the council.

This concludes my testimony on behalf of the council. I would be happy to respond to any questions.

Thank you.

Mr. **Kildee**. Thank you, Mr. Thompson.

I think we will probably wait until all the members of the panel have testified before asking questions.

Mr. Buchanan has joined us this morning, one of the more diligent, informed, intelligent members of the committee.

Mr. **Buchanan**. Thank you, Mr. Chairman. May I return the compliment?

I am sorry that a conflict in my schedule forced me to be late.

Mr. **Kildee**. I hope you realize that this is the last week before what we now call a district work period. I think a rose is a rose is a rose, it is still a recess, but we are working on the energy bill.

You can be assured that the testimony you have given will be thoroughly studied. I personally intend to do that and I know the staff will do that .

Your appearance here this morning is looked upon as extremely important, so even though you do not find a full house, there are other things going on on Capitol Hill today and we have to divide our time.

The next person to testify will be Ms. Joy Simonson, Executive Director of the National Advisory Council on Women's Educational Programs.

Ms. Simonson.

STATEMENT OF JOY R. SIMONSON

Ms. **Simonson**. Thank you very much, Mr. Chairman.

[Prepared statement of Ms. Simonson follows:]

national advisory council on women's educational programs

1832 M St., N.W.
Washington, D.C. 20036
(202) 653-5846

Statement of

The National Advisory Council on
Women's Educational Programs

Presented By Joy R. Simonson, Executive Director

Before the

House of Representatives
Subcommittee on Elementary, Secondary and
Vocational Education

Hearing on Advisory Councils

August 4, 1977

Mr. Chairman, I appreciate this opportunity to participate, along with representatives of other Office of Education Advisory Councils, in this Subcommittee hearing concerning the functions and activities of advisory councils. A member of the National Advisory Council on Women's Educational Programs, Dr. Jon Fuller, appeared before your committee on July 14 in connection with oversight hearings on the Women's Educational Equity Act. He discussed our Council's activities and we have supplied for the record considerable information about our budget, personnel and activities. I realize, however, that your present concern has a somewhat different focus and am therefore including in this presentation much of the same material.

The information requested by the Subcommittee concerning our budget, personnel, travel and meetings is submitted for the record. I would like to describe in greater detail the duties, responsibilities and accomplish-

Mary Beth Peters, Pittsburgh, PA, chair
Marguerite Selden, Washington, D.C. vice-chair

Joy R. Simonson, executive director

Mary Allen, Valley Center, KS
Katherine Burgum, Fargo, ND
Anne Campbell, Lincoln, NB
Joanne Carlson, Eugene, OR

Marjorie Bell Chambers, Denver, CO
Agnes I. Chan, San Francisco, CA
Agnes M. Dill, Isleta, NM
Elizabeth Z. Fryer, Brentwood, TN
Jon Fuller, Ann Arbor, MI

Thera C. Johnson, Ogden, UT
Sister Joyce Rowland, Winona, MN
Bernice Sandler, Silver Spring, MD
Theresa Aragon de Shepro, Seattle, WA
Gerald E. Weaver, Columbus, MS

EX OFFICIO MEMBERS
Chairman, U.S. Commission on Civil Rights · Director, Women's Bureau, U.S. Department of Labor · Director, Women's Action Program, U.S. Department of Health, Education and Welfare

ments of the Council, as requested in your items #1 and 6.

The National Advisory Council on Women's Educational Programs was established in PL. 93-380, sec. 408 (f), the Women's Educational Equity Act, a part of the Special Projects Act of 1974. Consisting of 17 public members appointed by the President and confirmed by the Senate and three ex officio members (the Chairman of the Civil Rights Commission, the Director of the Women's Bureau of the Dept. of Labor, and the Director of the Women's Action Program of the Dept. of HEW), ours is one of the largest of the Office of Education Councils. This fact has given us the benefit of a broad diversity of backgrounds and expertise; of course, it also requires proportionately greater expenditures for Council operations.

Of the several duties and responsibilities assigned to the Council by the Act (including minor amendments passed in 1976) some relate specifically to the implementation of the WEEA, while others are far broader. They may be grouped, for the purpose of discussing Council activities, as follows:

Council Functions Pertaining to WEEA

1. Advise the Commissioner with respect to general policy matters relating to the administration of this section; (Sec. 408 (f) (3) (A)
2. Make recommendations to the Commissioner with respect to the allocation of any funds pursuant to this section, including criteria developed to insure an appropriate geographical distribution of approved programs and projects throughout the Nation; (Sec. 408 (f) (3) (C)
3. Develop criteria for the establishment of program priorities; (Sec. 408 (f) (3) (E)
4. The Commissioner is directed, at the end of each fiscal year, to submit to the President and the Congress and to the Council a report setting forth the programs and activities assisted under this section, and to provide for the distribution of this report to all interested groups and individuals, including the Congress, from funds authorized under this section.

After receiving the report from the Commissioner, the Council shall evaluate the programs and projects assisted under this section and include such evaluation in its annual report. (Sec. 408 (f)

Other Council Functions

5. Advise and make recommendations to the Assistant Secretary concerning the improvement of educational equity for women; (Sec. 408 (f) (3) (B)
6. Make such reports as the Council determines appropriate to the President and the Congress on the activities of the Council; (Sec. 408 (f) (3) (D)
7. Disseminate information concerning the activities of the Council under this section; (Sec. 408 (f) (3) (F)
8. From the sums available for the purposes of this section, the Commissioner is authorized and directed to conduct a national, comprehensive review of sex discrimination in education, to be submitted to the Council not later than a year after the date of enactment of this section. The Council shall review the report of the Commissioner and shall make such recommendations, including recommendations for additional legislation, as it deems advisable. (Sec. 408 (f) (4)

The activities and accomplishments of the Council can logically be discussed in the sequence of the preceding list of our statutory obligations.

1. The earliest activity of the Council under this function was giving advice to the Commissioner concerning the proposed WEEA regulation. Many of our recommendations were incorporated in the final FY 1976 regulation. During the second year we again commented formally and consulted informally concerning the regulation at various stages. I believe it is fair to say that the Council's advice contributed to a marked simplification and clarification of the second regulation. We developed an analysis of the public comments submitted on the Notice of Intent to Publish a Regulation, which was transmitted to the Commissioner. Recently, we suggested to him that in FY 1978 no Notice of Intent be required, in hopes that the funding cycle could be expedited and grants and contracts awarded earlier in the year.

Due to staffing delays in the Council's initial year, we contracted with Mark Battle Associates, a minority-owned firm, to perform a process evaluation of the administration of the Act for us. A number of recommendations concerning development of the regulation, dissemination of information, review of applications, selection of grantees and contractors and the monitoring process were adopted by the Council and forwarded to the Commissioner. Several have already been implemented in the current funding cycle, while others require a longer time to be accomplished. Council members and staff appreciate the good cooperation of the Women's Program Staff. A copy of the summary report prepared by MBA for the Council is submitted for the Committee's files.

The Council has from time to time urged the Commissioner to allocate additional staff resources to the Women's Program Staff. We consider the size of this office insufficient to carry out both the WEEA program and the internal and external women's equity responsibilities which have been assigned to it.

2. The Council, after consultation with OE personnel and on the basis of its own program priorties, sent recommendations to the Commissioner regarding allocation of WEEA program funds and criteria for geographic distribution of projects. The Council, of course, plays absolutely no role in the selection of grantees or contractors.

3. Considerable thought was devoted by the Council to the matter of criteria for program priorities, resulting in the criteria attached hereto (Exhibit A).

4. Under the evaluation contract, a report was prepared based on site visits to three contractors and nine grantees, carefully selected according to several variables such as geography, duration, type of applicant, and program priority. These reviews are summarized in the report mentioned in #1 above. Additionally, Council members visited a limited number of project sites. We anticipate that members and staff will be able to visit more projects in FY '78 and these reports will be included in our annual report as required by the Act.

****

When the NACWEP first considered its responsibilities, it took its guidance from the purpose of the WEEA, which is "...to provide educational equity for women in the United States." Recognizing that this ambitious goal could not be accomplished primarily through the limited mechanism of the WEEA Program and its $6.2 million, the Council adopted a threefold framework for its activities:

> "that the Council must concern itself with the improvement of educational equity for women in all federally-assisted programs and not be limited to the WEEA;
>
> that women's concerns and needs must be incorporated throughout educational programs, i.e., "mainstreamed", and not left to a few specially-designated programs;
>
> that the Council must always have special concern for the needs of minority women who face double discrimination." (First Annual Report 1975.)

To help focus its resources, the Council in 1976 adopted criteria to determine areas for priority attention:

1. Must have implications for Federal policy
2. Must be "do-able" in terms of
    a. timing
    b. staff resources
    c. funding
3. Should result in maximum impact in terms of
    a. number of women potentially affected
    b. level of funding involved
    c. geographic dispersion
    d. nature of problem

4. Should generate interest and/or support from
    a. women and women's organizations
    b. education community
    c. community agencies
    d. government agencies
    e. Congress
    f. media
5. Should not duplicate efforts already underway but instead be
    a. leading
    b. supplementary
    c. complementary
6. Should not be readily supportable under other auspices (e.g., Office of Education, National Institute of Education, General Accounting Office.)

If potential issue does not meet criteria one and two, it will not be considered.

5. Within the preceding guidelines, the Council has advised the Assistant Secretary and, through her, other officials on a number of subjects.

a. Vocational Education

The National Advisory Council has, from its inception, considered vocational education to be a key area. We were delighted when the Congress enacted Title II of the Education Amendments of 1976 with its strong, clear language intended to overcome the sex stereotyping which has long characterized vocational education. Recognizing the crucial importance of program regulations, the Council has participated in each stage of this regulation-writing process. As a citizen's advisory group, the Council thought it useful to share with interested women's organizations around the country background information concerning the Act, the issues, and the hearings and other avenues of public input. We have analyzed the public comments received on some of the issues of special concern to women and are watching closely to determine how responsive the regulations will be when issued.

b. Career Education

Recognizing the enormous potential of career education for widening occupational horizons for girls and women, the Council has been following this legislation with close attention. You may recall that our former Chair, Bernice Sandler, testified before this Committee in March on H.R. 7. We not only appreciated your cordial reception of her, but, above all, the fact that the Committee, and subsequently the House, approved a version of H.R. 7 which emphasizes the need to eliminate sex bias and sex stereotyping from the Federally assisted career education program. Subsequently, we presented testimony before the Senate Committee and are hopeful that the legislation will be enacted with language similar to that of the House version.

c. Rural Women and Girls

In addition to such work on legislation as it affects women, the Council has given particular attention to certain groups and programs. The Council recognized that the rural population of women and girls has received much less attention, in terms of educational and other needs, than has the urban-suburban population. Therefore, we held a series of regional consultations in four widely diverse rural areas so that we could meet with and hear from local educators, community activists, and, above all, rural women themselves. The outcome of this effort was this report entitled "Educational Needs of Rural Womem and Girls," which we submit for your use. This report has received considerable attention in all parts of the country. We are encouraged by the positive response from organizations and women and are hopeful that it will stimulate increased attention to long-neglected needs.

d. Title IX

Since the Council considers Title IX to be of crucial importance to the achievement of educational equity, we have followed closely both legislative and administrative aspects of this law. We have advised the Assistant Secretary of our opposition to weakening amendments. We have also expressed views concerning HEW studies and reporting procedures affecting enforcement of Title IX.

e. Miscellaneous

The Council keeps an eye on as broad a range of legislative and regulatory developments as possible with our small staff, so that we can recommend inclusion of appropriate language to insure that the needs and concerns of women and girls are infused throughout Federally-assisted education programs. We have written to the Commissioner, the Director of NIE, to the Director of the National Center for Education Statistics and the Director of the Office of Civil Rights, in addition to the Assistant Secretary, to comment on proposed regulations, requests for proposals, statistical plans, etc. While one can never hope to bat 1,000, we believe that we have accomplished both specific changes and a heightened awareness of the widespread needs of women on the part of HEW officials.

f. Review of the Education Division

Among our major activities is a series of reports concerning various aspects of the Education Division of the Dept. of HEW.

> These reports will update and go well beyond the report prepared in 1972 by an Office of Education task force concerned with sex discrimination in OE programs. The first of this series, which will be transmitted to you in a few weeks, highlights the very limited employment of women in management and policy making positions within the Education Division. The next report covers the impact on girls and women of the disbursement of Education Division program funds, both formula and discretionary. We will also be examining the communications, internal and external, funded by the Education Division in order to ascertain how sex-fair they are. We will be reporting on data collection and its implications for sex equity and we will also issue a report concerning major education legislation and implementing regulations. We hope these reports will prove useful to this Committee as well as to the officials within HEW who have expressed great concern about equality of opportunity and of access for all groups.

6. Our reporting to the Congress and the President has been mentioned in connection with previous topics. In addition to our Annual Report and the report on rural women, we have just issued one entitled "Toward Educational Equity" which synthesize what the Council heard from public witnesses in three of its meetings around the country. We see ourselves in part as a channel of communication between persons concerned with educational equity in the community and the government agencies which can affect it. Our public sessions expand the Council's own knowledge and horizons and thus our usefulness to Federal officials. These meetings, each held in a different Federal region and alternating with Washington meetings, as well as more specialized hearings such as the four on rural women, enable individuals and local groups which are not normally or frequently in touch with Federal headquarters agencies to have input to programs which are significant to their lives. The Council thus brings to HEW (and to Congress when we are invited to testify on legislation) not only the varied knowledge and contacts of its diverse membership but also the grassroots views which we solicit through our outreach efforts.

7. Dissemination of information concerning Council activities may be considered the other half of our communication function. We find frequently a dearth of information--and a real hunger for it--on the part of women of all walks of life.

8. Under the statutory directive to the Commissioner to prepare and submit to the Council a "national comprehensive review of sex discrimination in education", we received three contractor-prepared reports covering professional employment in education, access to postsecondary education, and guidance and counseling. The Council devoted much work to reviewing and analyzing these reports. In accordance with the statute, we have sent to the Commissioner a lengthy list of recommendations based on these reports. Our recommendations are directed not only to Federal action, but include suggestions for State and local moves and actions by institutions of higher education, professional organizations, publishers, and individual researchers and practitioners. Were a major portion of our recommendations to be carried out, we are convinced that society would be far along toward the goal of educational equity for girls and women. (The list of recomendations, as we sent them to the Commissioner in March of 1977 is attached as Exhibit 8).

The Council was gratified that, in his memorandum to the Secretary of HEW concerning merger or termination of advisory councils (in which the Secretary concurred), the Commissioner said:

> I propose that the National Advisory Council on Women's Educational Programs be continued unchanged. Without question, this is one of the most productive and far-reaching councils in OE. The Council has a nearly unlimited charge, to advise us on the specifics of the Women's Educational Equity Act and in general on all matters affecting the

educational equity of women. Moreover, it is unique in speaking for over half the population of our country. On the basis of its exceptional nature, it merits an exemption from the Bureau-related structure I have heretofore recommended.

The attached record documents that the Council has more than fulfilled its mandated functions, providing national leadership in an area of great concern. In every area the Council has entered--regulations, legislation, policy issues, surveys, and so on--it has made its impact upon the policy makers in a profound manner. As the evaluation concludes, were this Council not in existence, it ought to be. In accordance with the established criteria I recommend the continuation of the National Advisory Council on Women's Educational Programs.

Revised December 4, 1976

EXHIBIT A

RECOMMENDATIONS OF

NATIONAL ADVISORY COUNCIL ON WOMEN'S EDUCATIONAL PROGRAMS

Criteria for Establishing Program Priorities Under the Women's Educational Equity Act

In order of importance, the National Advisory Council on Women's Educational Programs recommends that the following goals be the basis for designating program priorities under the Women's Educational Equity Act:

1. Promoting educational equity for women and girls by fostering change in institutions, agencies, and departments in their policy-making, resource allocation, employment practices, and program administration and content.
2. Assisting population groups which have special needs for support in order to bring about educational equity for women and girls.
3. Abolishing sex-role stereotyping in guidance and counseling, and curriculum materials - including educational media.
4. Ensuring equal educational opportunity in career-related programs.

Criteria for Project Selection

A. As a totality, projects selected for funding should:

   1. Reflect a variety of approaches and strategies for addressing particular needs of women and girls for educational equity.
   2. Reflect a variety of delivery systems—community organizations, student groups, public and non-profit private agencies—as well as traditional educational institutions.
   3. Represent geographic and demographic diversity.
   4. Work toward resolution of long-range as well as short-range problems.

B. Each project should be considered in terms of its ability to:

   1. Impact upon the maximum number of women and girls—particularly those groups with multiple needs (e.g., minority women), in order to produce maximum results with minimum resources.

2. Evidence reasonable expectation of the project or its results (a) being incorporated into the regular program of the institution, community, region, or state within which located, and/or (b) being replicated or adapted in other locations.

3. Emphasize role of women in developing, implementing, and evaluating the project.

4. Address objectives which are specific, measurable, and offer reasonable expectation of being accomplished within a specific time frame.

5. Facilitate communication and cooperative ventures between levels of education and kinds of education. (e.g. A successful career education project focusing on sex-role stereotyping at the junior high school level needs to work with (a) teachers of all subject matters to develop awareness and exploration opportunities in a variety of career fields, and (b) work with high school counselors and other personnel to expand vocational offerings and options.)

national advisory council on women's educational programs

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1832 M St., N.W.
Washington, D.C. 20036
(202) 252-3362

Exhibit 13

CE - 77-08

March 24, 1977

Dr. Ernest Boyer
U.S. Commissioner of Education Designate
U.S. Office of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear ~~Commissioner Boyer~~: Ernie

In accordance with Section 408(f)(4) of the Women's Educational Equity Act, the National Advisory Council on Women's Educational Programs is pleased to transmit herewith our comments and recommendations based on the reports prepared under this section of the Act as a "national, comprehensive review of sex discrimination in education."

The statutory mandate was fulfilled by your predecessor in the form of three reports which were contracted for by the National Center for Educational Statistics and transmitted to the Council in the spring of 1976. The reports are on the subjects of Guidance and Counseling, Access to Postsecondary Education, and Employment Practices Affecting Professional Educational Personnel. The Council is gratified to learn that these reports are being placed in the ERIC system and thus made available for public use. We recommend, as we did in our letter of October 28, 1976, that the Office of Education give additional publicity to the fact that these reports are now in the public domain. We believe that they contain information of considerable interest as well as bibliographies which may be useful to members of the public who do not ordinarily have access to or utilize the ERIC system.

The Council regrets the delay in preparing and transmitting to you our recommendations based on these reports. The delay was occasioned in large part by our finding that the reports do not, in our judgment, constitute a comprehensive review of sex discrimination in education. Therefore, we felt compelled to employ consultants to assist us in reviewing these reports, in learning the history of their development, and in considering the gaps or omissions in coverage. As mentioned in our recent letter to you concerning the survey of sex discrimination in vocational education which is presently being planned, we believe that the experience with the survey mandated by the Women's Educational Equity Act can serve as a guide for other similar efforts.

Bernice [illegible], Silver Spring, MD, chair
Mary Beth [illegible], Pittsburgh, PA, vice chair

Mary Allen [illegible] Center, KS
Ernest Boyer, [illegible], NY
Katherine [illegible], Fargo, ND
Anne Campbell, Lincoln, NB
[illegible] Carlson, [illegible], OR

Marjorie Bell Chambers, Denver, CO
Agnes I. Chan, San Francisco, CA
Agnes M. Dill, Isleta, NM
Elizabeth Z. Fryer, Brentwood, TN
Jon Fuller, Ann Arbor, MI

Joy R. Simonsen, executive director
Rosemary C. Mylecraine, deputy director

Thera C. Johnson, Ogden, UT
Sister Joyce Rowland, Winona, MN
Marguerite Selden, Washington, DC
Theresa Aragon de Shepro, Seattle, WA
Gerald E. Weaver, Columbus, [illegible]

The attached recommendations are limited to areas covered in the Commissioner's report. The large number of recommendations certainly indicates the scope and severity of sex discrimination in the world of education.

You will note that we have included no recommendations for revision of Title IX, although several such proposals were included in the three reports. This is because the Council, fearing any weakening of Title IX, is sufficiently wary of opening it to amendment for any purpose at this time that we look to regulations or other reasonable avenues to achieve the desired ends.

The Advisory Council fully intends to maintain an ongoing interest in the recommendations transmitted herewith. We foresee establishing a tracking system for ourselves so that we may follow the implementation of the recommendations. We are planning also to send you a list of suggestions as to government and non-government bodies which we believe may be appropriate to carry responsibilities for specific recommendations. We hope that these suggestions, while certainly not comprehensive, will be useful to your staff.

The Council would welcome an early opportunity to meet with you to discuss measures which can be undertaken to implement a variety of these recommendations. While we have no wish to impinge on the functions of your office or other components of the Education Division, we are anxious to be helpful in any appropriate ways. We hope you agree that these reports and recommendations represent a challenge and an opportunity for leadership by your office in the urgent effort to achieve educational equity in American education.

Sincerely,

Bernice

Bernice Sandler
Chair

Enclosure

ATTACHMENT TO TESTIMONY BEFORE HOUSE OF REPRESENTATIVES SUBCOMMITTEE ON ELEMENTARY, SECONDARY AND VOCATIONAL EDUCATION

August 4, 1977

EXPENDITURES FY 1976
(15 months)

Staff Salaries (includes benefits and payroll charges)		$103,063.
Council and Committee Meetings		90,835.
General Operation of Office and Equipment		15,417.
Special Projects:	Rural Women Report	20,045.
	WEEA Evaluation	38,296.
	Women's Studies Report	25,000.
	Education Division Review	37,686.
Editorial and Graphics Contracts for Above		27,520.
Other (attendance at National conferences, members travel and salaries on other Council business, etc.)		8,400.
Total		$366,262.

BUDGET FY 1977 (estimates)

Staff Salaries	$144,897.
Council and Committee Meetings	73,001.
Members Travel and Salary for Other Council Business	8,636.
General Office Operation and Equipment	16,700.
Printing of Reports (minimun of nine reports)	18,250.
Dissemination Activities	7,300.
Site Visits	5,402.
National Conferences (travel and salaries)	3,772.
Contracts/Consultants: Projects include WEEA Evaluation and Technical Assistance Community Colleges and Displaced Homemakers Title IX Implementation Outside HEW Educational Needs of Indian Women and Girls	22,342.
Total	$300,300.

August 4, 1977

ATTACHMENT TO TESTIMONY BEFORE HOUSE OF REPRESENTATIVES SUBCOMMITTEE ON ELEMENTARY, SECONDARY AND VOCATIONAL EDUCATION

Travel and Meeting Costs FY 1976

MEETING COSTS [1]

	Salaries[2]	Travel	Total
Members	$37,473.	$47,448.	$84,921.
Staff	---	5,480.	5,480.

TRAVEL COSTS

	Meetings	Other [3]	Total
Members	$47,448. (above)	$497.	$47,945.
Staff	5,480. (above)	1313.	6,793.

Travel and Meeting Costs FY 1977
(up to July 15, 1977)

MEETING COSTS [4]

	Salaries	Travel	Total
Members	$20,833.	$27,197.	$48,030.
Staff	---	3,469.	3,469.

TRAVEL COSTS

	Meetings	Other	Total
Members	$27,197. (above)	$1,093.	$28,290.
Staff	3,469. (above)	2,130.	5,599.

NOTE: Meeting and travel costs overlap

1/ Six Council and twenty-eight committee meetings
2/ Figure includes benefits and payroll charges
3/ Figure includes site visits, National conferences, member travel to work with Council staff in Washington, local transportation in Washington.
4/ Four Council and twenty-one committee meetings

Ms. Simonson. The National Advisory Council on Women's Educational Programs, as you probably are aware, was established under the Women's Educational Equity Act, passed in 1974 as part of the Special Projects Act.

Our council has 17 public members who are appointed by the President, but our members also run the gauntlet of Senate confirmation.

In addition, we have three ex-officio members. This makes ours one of the largest councils and gives us the benefits of tremendous diversity of experience, background, geography and so on, but also requires somewhat higher operating expenses in our budget.

The budget and personnel and travel items which the chairman requested in his letter have been submitted with my written statement, which I understand will be part of the record.

Three types of functions were assigned to our Council: One, advise the Commissioner on aspects of WEEA; two, advise the Assistant Secretary for Education concerning improvement of educational equity for women and girls; three, report to Congress and the President and disseminate information about our activities.

Under our Women's Educational Equity Act responsibilities, we have given the Commissioner of Education recommendations on many aspects of the program administration, the development of the regulation, the staffing of the program office and have sent him an extensive evaluation.

I have two large volumes of the evaluation here. I would appreciate submitting to the committee simply the summary volume of this evaluation.

After looking at the various functions the Congress gave our council, the members decided very early that the broader mandate was even more significant than the requirement to evaluate the operation of that one act.

When the council first thought about its responsibilities, it took its guidance from the purpose of the Women's Educational Equity Act, which is "to provide educational equity for women in the United States." Recognizing that this ambitious goal could not be accomplished primarily through the limited mechanism of the WEEA program, and its $6.2 million, the Council adopted a threefold framework for its activities.

These were reported in our 1975 annual report as follows:

That the council must concern itself with the improvement of educational equity for women in *all* federal assistance programs and *not* limited to WEEA.

Two, that women's concerns and needs must be incorporated throughout educational programs, that is, mainstreamed, and not left to a few specially designated programs.

Finally, that our council must always have a special concern for the needs of minority women who face double discrimination.

Now, within that framework, we have covered a range of topics. We have participated very actively in the development of the regulations to implement the Vocational Education Act of 1976. We think Congress did an outstanding job on behalf of women and girls in passing that act and we are participating at various stages and watching closely to see how the regulations come out.

We have testified both before this committee and in the Senate on the pending career education legislation. We see that also as having tremendous potential for the future of girls and we hope very much that the House-passed version of that legislation or something very close to it will come out of the Congress before the end of the year.

We have offered comments to numerous HEW offices concerning various regulations, requests for proposals, statistical plans, legislative planning and so on. In each instance we look at whatever the document or proposal may be in order to see if the potential impact on women and girls been thought of; is there some additional language or some additional thinking that should go into it so that it will in fact be equitable?

We held four regional hearings and issued a special report on the educational needs of rural women and girls which I would like to submit to the committee at this time. It has been very well received around the country and we believe it has stimulated some thinking and activity in local communities and we hope it will do likewise at the federal level.

One of our major activities has been drafting a series of reports which will shortly be coming out and, of course, coming to the committee, concerning aspects of the Education Division of HEW. We are looking at what they are, or often are *not*, doing for women within the Department in terms of employment in top level positions and more important perhaps, or just as important, what are they doing programmatically through both the formula and discretionary programs for which they are responsible.

We, like the other councils you have been hearing from, hold at last half of our meetings in cities away from Washington and arrange for public hearings to be part of each of these meetings so that we can learn from people in the community the kinds of needs and problems which they see for women and girls. We feel that this is an important part of our function. While it is not spelled out explicitly in the law, we think the dissemination mandate that you have given us calls for us to function in a two-way capacity. We hear from people out in the community and use their views and informtaion in giving advice to HEW and we likewise bring information about many Federal education programs to people in the community.

In that context, I might say we have been disturbed to find time and again that title IX—(which, as you know, of course, is the basic federal statute banning sex discrimination in federally assisted education programs)—is not nearly as widely known as it should be and obviously not widely enforced and complied with, so we will be giving a great deal of attention to that problem.

Under the statute Congress directed the Commissioner of Education to prepare a report on "a national comprehensive review of sex discrimination in education" and submit it to our council. That report was in fact prepared and it is in the form of all of these documents. I am not claiming credit for them. Our council didn't prepare them, but I think this was an important set of studies and I think perhaps if the committee had it in its files, it would be useful occasionally.

On the basis of these studies, our council sent the Commissioner a considerable list of recommendations. They are attached to my written statement and they will give the committee an idea of the scope of concerns which we look at.

They cover not only Federal problems, but also those in the state, local private sectors because we are really very well aware that the struggle to achieve educational equity must be waged on many fronts. It cannot be done in isolated programs; it cannot be done solely at the Federal level. It is something that has to be worked on at every level in our society by institutions and by individuals throughout the country.

As far as our own council's worth and accomplishments go, I think, like my predecessor from the Indian Education Council, rather than attempt to, shall we say, blow our own horn, I will just quote briefly from the assessment of the Commissioner of Education when he was reviewing advisory councils. This assessment was concurred in subsequently by the Secretary of HEW.

The Commissioner said, "I propose that the National Advisory Council on Women's Educational Programs be continued unchanged. Without question this is one of the most productive and far-reaching councils in OE. The Council has a nearly unlimited charge to advise us on the specifics of the Women's Eduational Equity Act and in general on all matters affecting educational equity of women.

> Moreover, it is unique in speaking for over half the population of our country, on the basis of the exceptional nature it merits an exemption from the Bureau-related structure I have heretofore recommended.
>
> The attached record documents that the Council has more than fulfilled its mandated functions of providing national leadership in an area of great concern. In every area the Council has investigated—regulations, legislation, policy issues and so on—it has made its impact upon the policy makers in a profound manner.

The evaluation concludes,"Were this council not in existence, it ought to be. In accordance with established criteria, I recommend the continuation of the National Advisory Council on Women's Educational programs."

I guess I couldn't have said it better if I had written it myself. Thank you.

Mr. KILDEE. Thank you very much, Ms. Simonson.

[Recess taken.]

Mr. KILDEE. We were prepared to hear testimony of Mr. James Lehmann, Council Member of the National Advisory Council on Bilingual Education.

STATEMENT OF JAMES LEHMANN

[The prepared statement of James Lehmann follows:]

TESTIMONY

Presented

to

Congress of the United States

House of Representatives

Committee on Education and Labor

Subcommitteee on Elementary, Secondary

and

Vocational Education

by

James D. Lehmann

Council Member

National Advisory Council on Bilingual Education

National Advisory Council On Bilingual Education

Background

Section 723 of the Bilingual Education Act mandates the establishment of the National Advisory Council On Bilingual Education. Consistent with Section 504 of the congressional Budget and Impoundment Control Act of 1974 and Section 14 of the Federal Advisory Committee Act, the National Advisory Council on Bilingual Education remains chartered through September 30, 1978.

Purpose

The Bilingual Education Act declares it to be the policy of the United States to encourage the establishment and operation, where appropriate, of educational programs using bilingual education practices, techniques and methods, and for that purpose, to provide financial assistance to local educational agencies, and State educational agencies to develop and carry out such programs in elementary and secondary schools, including activities at the pre-school level, which are designed to demonstrate effective ways of providing, for such children, instruction designed to enable them, while using their native language, to achieve competence in the English language. The Education Amendments of 1974 also provide that special assistance be given to the needs of persons of limited English-speaking ability through bilingual adult and vocational educational programs. Discharge of these responsibilities requires the advise of the National Advisory Council on Bilingual Education.

Function

As previously stated, the functions of the National Advisory Council on Bilingual Education are authorized under Section 732 of the Bilingual Education Act (20 U.S.C. 880b-11) and are governed by provisions of Part D of the General Provisions Act (20 U.S.C. 1233- et seg) and the Federal Advisory Committee Act (5 U.S.C. - Appendix I).

The primary function of the National Advisory Council on Bilingual Education is to advise the Secretary of Health, Education, and Welfare; the Assistant Secretary for Education; and the Commissioner of Education in the preparation of general regulations and with respect to policy matters arising in the administration and operation of the Bilingual Education Act, including the development of Criteria for approval of applications, and plans under the Act, and administration and operation of other programs for persons of limited English-Speaking Ability. The Council shall also prepare and submit a report to the Congress and the President on the condition of bilingual education in the Nation. The report shall be prepared and submitted no later than November 1 of each year. The report shall also address itself to the administration and operation of other programs for persons of limited English-speaking ability.

Structure

The Council consists of 15 members. The chairperson is appointed by the Secretary. The balance of the members representing the following composition:

- at least eight members should be persons experienced in dealing with the educational needs of children of limited English speaking ability;

- at least one should be representative of persons serving on boards of education operating programs of bilingual education;
- at least three members should be experienced in bilingual teacher training;
- at least two members should be persons with general experience in elementary and secondary education;
- at least two members should be classroom teachers;
- the members of the Council should be representative of population of limited English speaking ability and their respective geographic areas.

Members serve staggered three-year terms, subject to renewal of the council by appropriate action prior to its expiration. At present five positions on the council remain vacant.

The council is authorized to establish five standing committees: Executive, Budget, Public hearings and Report to Congress, Non-Spanish Bilingual/Bicultural Programs, and the Legislative Committee. Also, the Council is authorized to establish such other committees as may be required to insure the execution of its functions.

At present no Ad hoc committees are convened.

Meetings

Council meetings are held at least four times each year at the call of the chairperson. This call is with the approval of the Commissioner or the Commissioner's designee, who shall approve the agenda and be present at all meetings.

All meetings unless otherwise determined by the Commissioner are open to the public. Notice of all meetings are given to the public. All meetings are conducted and recorded in accordance with applicable laws and department regulations.

This year the Council has met on the following dates: November 11-13, 1976 in San Francisco, California; January 27-29, 1977 in Austin, Texas; April 3-5, 1977 in New Orleans, Louisiana; and June 17-19, 1977 in Washington, D.C.

Budget

Management and staff services are provided by the Director, Office of Bilingual Education. The annual cost for operating the council; including compensation and travel expenses for members but excluding staff support is $100,000. The following is a detailed budget Illustrating council expenditures to date:

Budget

Function		FY '77 NACBE Expenditures
I. Council Meetings:		
a. November 11-13, 1976	(San Francisco)	$ 9,298.51
b. January 27-29, 1977	(Austin)	10,055.45
c. April 3-8, 1977	(New Orleans)	12,650.40
d. June 17-19, 1977	(Washington, D.C.)	7,659.44
		$39,663.80
II. Third Annual Report	(November 1, 1977)	$30,000.00
III. Issue Papers		
a. Maintenance vs. Transitional Bilingual Programs		$ 2,490.00
b. Service vs. Demonstration vs. Start-Up Costs		2,490.00
c. Serving Asian and Pacific Island Groups in Need of Bilingual Education		2,490.00
		$ 7,470.00
IV. Travel Allowance - (Trips other than Council Meetings)		$ 3,827.87
V. Supplies		$ 63.90

VI. Rental a. Shoreham Americana & Holiday Inn (SFO)		$ 296.00
b. Quality Inn (DC)		170.00
		$ 466.00
VII. Printing		
a. NACBE Stationary		$ 55.00

$100,000.00	'77 Budget	GRAND TOTAL	$81,546,57
-81,457.43	'77 Up to date expenditures		
$ 18,457.43			

Accomplishments

The National Advisory Council on Bilingual Education is responsible for the following accomplishments during the fiscal year 1976:

- Public Hearings - Public Hearings were conducted in San Francisco, California, Austin, Texas, and New Orleans, Louisiana with the intent of obtaining field - sensitive information pusuant to administration and operation of the Bilingual Education Act;
- Issues - Issues germane to the administration and operation of the Bilingual Education Act were identified by the Council and were examined by the development of a series of Issue Papers.
- End of Year Report - The end of year report submitted to the Congress and the President on the condition of bilingual education in the Nation has received national acceptance. Numerous colleges, agencies and affliated organizations have effectively incorporated the data contained within this report into some form of daily operation.

Summary

The National Advisory Council on Bilingual Education has attempted to fullfill its assigned responsibilities. This attempt, however, perceived or otherwise has been a sincere one. The National Advisory Council on Bilingual Education has been united in purpose and has attempted to provide informed and significant advise pursuant to the administration and operation of programs funded under the Bilingual Education Act.

Recommendations

The following recommendations are presented in the spirit of strengthening the existing Council:

- That the National Advisory Council on Bilingual Education should continue to operate as a seperate entity. Consolidation with Councils from Right to Read, Teacher Corps, and Career Education would not afford the necessary direction which is so critical to the future of the more than 3½ million children of limited english speaking ability in the Nation.
- The nature of the "art" of Bilingual Education requires unique and special talents. Every consideration should be given to replacing existing and future vacancies on the Council with experience bilingual educators. It has been commonplace to simply consider the bilingualness of the individual irrespective of his insight and experience in bilingual education. If this Council is to offer advise to the Congress and the President on bilingual education, it should emanate from a broad base of bilingual education practioners and not from a bilingual clerk-typist who has never ventured into a bilingual classroom.

Mr. **Lehmann**. Thank you, Mr. Chairman.

Greetings from behind the Cactus Curtain. I am James Lehmann, Assistant Director, Education Service Center, Austin, Texas, and a Council Member on the National Advisory Council on Bilingual Education.

Before I begin I would like to introduce Mr. John Molina, Director of Bilingual Education. John, would you please stand?

Mr. **Kildee**. We welcome you. We have had the occasion to meet you.

Mr. **Lehmann**. I want to digress from my written statement to simply state I have found Dr. Alford's statement very, very interesting, very refreshing, particularly his statement about local education agencies having undue intrusion from local advisory councils. That is kind of the way I feel when I come to Washington sometimes.

Consistent with the instructions provided by Chairman Perkins in his letter, the National Advisory Council on Bilingual Education has submitted written testimony addressing itself toward the six specific points as requested. To briefly summarize, the National Advisory Council on Bilingual Education consists of 14 members, two Chinese-American, three Mexican-American, one Greek-American, two American Indians, one Italian-American, two Franco-Americans, two Puerto Rican-Americans and one Spanish-American.

This is a truly 100% bilingual Minority Council.

This council has an operating budget of $100,000. From these funds during the last year we have held 4 meetings in San Francisco, in Austin, in New Orleans, in Washington, D. C. We are scheduled to hold one more again in Washington, D. C., in September before the end of the fiscal year.

We have held three public hearings in conjunction with meetings held in San Francisco, Austin and New Orleans.

The information obtained from these public hearings has been incorporated and will be the text or the bulk of the text for our third annual report to the Congress and the President on the state of bilingual education pursuant to the impact of the Bilingual Education Act.

I shall not read the entire text, but would like to simply state that I think the testimony that has already been given by the other panelists generally applies to the National Advisory Council on Bilingual Education. However, in summary, let me state that the National Bilingual Council, the National Advisory Council on Bilingual Education, would urge that any consideration for consolidation of this council consistent with accepted or official party policy be seriously and completely examined in the light of the fact that this is one of the few existing councils which has endeavored to provide an open line of communication with the over 3.5 million constituents of this country that are classified as being of limited English-speaking ability. We are geographically and ethnically representative of these three and a half million people and I can assure you that the contributions of this cadre of professional people is 100 percent committed to enhancing the educational experiences and providing the best quality educational experiences obtainable for the children of limited English-speaking ability for whom the Bilingual Education Act has been primarily developed.

Thank you.

Mr. **Kildee**. Thank you very much, Mr. Lehman.

Next will be Mr. George Meyer, Chairman of the National Advisory Council for Career Education.

STATEMENT OF GEORGE MEYER

Mr. **Meyer**. I really appreciate the opportunity to come here today and talk somewhat about the National Advisory Council for Career Education, some of our efforts, accomplishments and hoped-for future of career education.

I have submitted a prepared statement which I will not read, but merely review.

[The prepared statement of George Meyer follows:]

National Advisory Council for Career Education

Report by
George F. Meyer, Jr., Chairperson
August 4, 1977

I. Responsibilities of the NACCE

The National Advisory Council for Career Education was established by the Education Amendments of 1974, P.L. 93-380. The Council received two overall charges from the Congress: to assess, monitor and report on the condition of career education as an educational reform movement and to recommend to Congress appropriate legislation for furthering the goals of career education. Specifically, the Council is authorized to advise the United States Commissioner of Education on the implementation of Section 406 of P.L. 93-380, the law which established the Office of Career Education. The Council, therefore, is responsible for advisory functions relating to programs in HEW which pertain to career education development, implementation and evaluation.

Within this framework, the Council has determined several specific working goals: to examine career education needs and opportunities at the postsecondary level and formulate recommendations for legislation in this area; to improve the status of career education through further clarification, validation, and articulation of concepts; to promote evaluation of the effectiveness of career education efforts; to encourage participation of states, related Federal agencies, business, labor, professional and community organizations in the implementation of career education; to develop a career education professional development plan; and to articulate the relationship of career education to the "back to basics" movement.

II. Budget - FY '76.- breakdown by purpose or area:

$121,000 - travel, honorarium, steno-typist and meeting rooms, small contracts, and printing.

III. Number of staff and expenditures:

The Council has operated without permanent staff. Since its inception it has utilized the services of an intern and an Educational Policy Fellow, both on part-time bases and regular staff on over time.

IV. Expenditures for travel:

Approximately $17,000 which varies each year depending on number of meetings, place of meetings, and location of members.

V. Number of meetings annually and cost per meeting:

# of meetings

Calendar year 1975: 5
Calendar year 1976: 6
Calendar year 1977 (to date) : 5

# of meetings

Fiscal Year 1976: 7
July 1975
September 1975
October 1975
February 1976
March 1976
May 1976
July 1976

Average cost per meeting:

$7,100 in FY-76. Varies each year depending on location of members.

VI. Accomplishments:

The Council, with the assistance of the Commissioner, has been required to conduct a survey and assessment of the current status of career education programs, projects, curricula and materials in the United States and submit to Congress, not later than November 1, 1975, a report which includes recommendations of the Council for new legislation designed to accomplish the policies and purposes set forth in subsections (a) and (b) of Section 406.

Both of these tasks have been accomplished. The survey and assessment report, Career Education in the Public Schools 1974-75: A National Survey (American Institutes for Research) was published in May, 1976 and transmitted to Congress on May 27, 1976. The report, NACCE Interim Report with Recommendations for Legislation, November 1975 was included in the Annual Report of March 31, 1976.

In addition, the National Advisory Council for Career Education, in FY 76, commissioned a total of fourteen papers and studies on a number of important issues relating to career education. Through these papers the Council has sought to gather information which will increase the effectiveness of the Council's own activities, to close the knowledge gaps for the Office of Career Education staff, and for public dissemination. The following papers were commissioned in FY '76:

1. "The Efficacy of Career Education, Career Awareness," Dr. Elvis H. Arterbury
2. "The Efficacy of Career Education, Academic Achievement," Ms. Rita Bryant
3. "The Efficacy of Career Education, Career Decision-Making," Dr. Michael J. Masucci
4. "The Efficacy of Career Education, Other Ways of Assessing Effectiveness," Ms. Cherylynn Schager
5. "The Emerging History of Career Education: A Summary View," Dr. Edwin L. Herr
6. "An Analysis of State Laws on Career Education and Pending State Legislation," Dr. David Jesser
7. "Doctoral Research Studies Related to Career Education," Dr. Robert Worthington
8. "An Analysis of Federal Legislation Bearing on Career Education," Dr. Melvin L. Barlow
9. "Key Concepts to be Addressed by NACCE," Dr. Joel S. Berke

10. "Analysis and Synthesis of Existing Career Education Legislation," Dr. Joel S. Berke and Mr. Terry W. Hartle
11. "The Implementation and Administration of a Federal Career Education Program," Mr. Terry W. Hartle
12. "Proposals for Career Education Legislation," Dr. Melvin Barlow
13. "Career Education and the Future," Mr. Raymond G. Wasdyke
14. "Career Education: An Idea Whose Time Has Come," Mr. Terry W. Hartle and Dr. Joel S. Berke

The first five papers on this list were published by the Government Printing Office, as well as an additional document, A Summary of Commissioned Papers Prepared for the National Advisory Council for Career Education.

Attachments:

Interim Report, November 1976

1976
INTERIM REPORT OF THE

NATIONAL ADVISORY COUNCIL FOR CAREER EDUCATION

NOVEMBER 18, 1976

This report is published under provisions of Public Law 93-380, Section 406 of the Education Amendments of 1974.

The opinions expressed in this report do not necessarily reflect the position or policy of the U.S. Office of Education, and no official endorsement by the U.S. Office of Education should be inferred.

National Advisory Council for Career Education, 1976

The purposes of this report of the National Advisory Council for Career Education are threefold: (1) to describe briefly and without exaggeration the current status of career education, (2) to present legislative and other recommendations of the Advisory Council, and (3) to summarize, without becoming bogged down in minutia, Council activities and actions of the past year.

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CURRENT STATUS OF CAREER EDUCATION

Six years have elapsed since Sidney P. Marland, Jr. (then Commissioner of Education) first publicly coined the term, career education, to describe the merging of academic and vocational curricula so that those who complete grade 12 would be ready to enter higher education or the labor market. Launched in favorable seas, the career education movement has grown rapidly, permeating every level of education—elementary, secondary, and higher education—in this country.

Leadership at the national level for this movement has been provided by the Office of Career Education, established in 1974 (P.L. 93-380). That office defined career education as the "totality of experiences through which one learns about and prepares to engage in work as part of her or his way of living." Its Director, Kenneth B. Hoyt, and staff have encouraged State and local school agencies to develop systematic means for advancing students' understanding of the relationship between education and work. While the Office of Career Education has emphasized that career education is for all learners at all ages, its limited financial resources have been targeted to supporting career education models and demonstration projects, primarily at the elementary and secondary school level. During FY 75, only 80 demonstration projects out of the 880 proposals submitted could be funded with the monies available and during FY 76, 71 out of 944 demonstration projects were awarded grants from its limited funds.

Career education has won much public support. Several factors contribute to the public's receptivity of career education. Educators have long been concerned about whether those students who seek to enter the labor market when they leave school have the skills to do so. More and more parents have become personally aware, often painfully, that teenage unemployment has been double and triple that of workers, 25 years and older, for the past fifteen years. They want their sons and daughters equipped to enter the labor market with some hope for success and increasingly hold the schools accountable when their children are unable to do so. Schools ought not be held accountable for remedying youth unemployment, but they can and should be held responsible for equipping school leavers with employability skills. Still other factors have contributed to the ever-growing acceptance of career education including the increasing numbers of individuals who seek to develop "second careers," for any one of several reasons. These men and women, often in midlife, are starting different careers and are returning to educational institutions to learn new skills needed to function successfully in that second career. Public acceptance of and support for career education have been documented by many national, State and local polls that suggest that people want public education at all levels to become more responsive in bridging the gap between education and work, a primary goal of career education.

Some 47 national organizations—Chamber of Commerce, General Motors, National Council of Churches, AFL-CIO, National Alliance of Businessmen, National Association of Manufacturers, American Legion, Girl Scouts of America—to cite but a few, have endorsed career education and many have formulated plans for their members' active involvement in career education activities. Members' participation in career education at State and local levels, along with other community groups, organizations and many individuals, have contributed substantially to making career education a reality in many communities.

The Commissioner of Education conducted a national career education conference in November 1976, which attracted 8,300 persons with delegations from all 50 States. This conference served to demonstrate the high degree of interest in, support for, and readiness to implement career education across the nation.

Baseline data about career education in local and State educational agencies were reported recently by the American Institutes for Research (*Career Education in the Public Schools, 1974-75: A National Survey)*. These data, collected but three years after the inception of career education, demonstrate its ready acceptance within the nation's schools. At the local education level, more than one-quarter of the nation's 16,000 school districts have adopted or were planning to adopt formal written career education policies, one-fifth of the districts employed at least one full-time career education staff member, and the majority of the nation's students were in districts in which *some* career education activities were being conducted. At the time of the A.I.R. report (1974-1975), it was determined that at the State level, nine States had enacted career education legislation and 13 others were "considering" such measures. Some 42 States had formulated and adopted formal written career education policies but only 27 of them included a plan for the organization of career education activities in their formal policy statements.

Despite the tremendous array and variety of career education activities and procedures being conducted by State and local educational agencies in 1974-1975, the national assessment report estimated that but three to thirty percent of elementary school students, ten to forty percent of middle level school students and twenty-five to forty-five percent of secondary school students were being exposed to career education activities. And even those "activities" were contaminated by including counseling, occupational information, placement and other established services.

That report estimated that the nation had moved but fifteen percent of the way toward providing comprehensive career education for elementary and secondary school students. First among the reasons advanced by State and local agencies for their inability to move career education was lack of funds, materials, and general assistance from State and Federal governments.

Federal funds were urgently needed to prepare teachers, counselors and other educational personnel to engage competently in career education activities, to purchase materials, to make curriculum changes and to transport students to work sites, to cite but a few.

No generalization about the progress of career education can be made to fit all fifty-four States and territories. Some States, of course, are doing an excellent job of providing high levels of career education. Michigan, Texas, Oregon, to mention only a few, have well deserved reputations for implementing career education. But there are others where many things remain to be done. Many informed authorities suggest that the order of greatest activity and development of career education among the various educational institutions, to date, has been: (1) elementary schools, (2) middle or junior high schools, (3) high schools, (4) community colleges and (5) colleges and universities.

Given these and other developments, new Federal legislation is needed which (1) elevates career education in elementary and secondary schools from its present demonstration to an implementation level and (2) initiates career education model building within postsecondary educational institutions.

This report of the status of career education would be remiss if it failed to acknowledge the existence of some controversy. Career education has not been without its critics, particularly during this past year. The National Advisory Council for Career Education has no wish to brush aside the criticisms; they must be understood and answered. Most critics of career education are people of good will who have thoughtful arguments to offer. Some few question, for example, the desirability of career education, deny that its efforts are appropriate for resolving the problems for which they are targeted and maintain that change in education can only be brought about by social reform of considerable magnitude. These and other fundamental issues are not settled readily or harmonized quickly nor is this report the place to respond to them. During 1977, the National Institute of Education has formulated plans to bring advocates and critics of career education together to examine and discuss fundamental issues. It is believed that these debates will be useful in clarifying current career education efforts.

As a concept, career education represents a cluster of ideas, hopes, interests and practices many in number, intricately interrelated, often tangled and untidy. It is idle to pretend that the problems career education seeks to remedy are simple, or that the array of ideas espoused in its name always coherent, the methods always pat or its objects always fixed, in this, its sixth year of existence. Despite the imperfections in the concept of career education, or in truth, because of them, that which has been accomplished in its name is truly remarkable, given the short time of its existence and the limited initiative provided it by the Federal Government.

Clearly, the most important characteristic about this picture of career education six years after its origin is that it is a *moving* one. There is nothing static about it and its strength shows no sign of abating or ebbing away. The achievements of career education have been many and real. But much remains to be done if education and work are bridged so that both come alive for all learners, young and old alike. The recommendations that follow outline actions that the National Advisory Council for Career Education believe ought to be taken . . . *now*.

RECOMMENDATIONS

The statements that follow summarize the recommendations by the National Advisory Council for Career Education to the Commissioner of Education, to State and local school administrators and career education specialists. These eleven recommendations have been drawn from the Council's experiences and activities during the past year. Support for and elaboration upon these recommendations will be found in the pages that follow. The National Advisory Council for Career Education recommends:

1. *That Federal legislation be enacted that advances career education for elementary and secondary school students from its current planning and demonstration stage to an implementation level.* Federal funds should be made available to States and local educational agencies to implement comprehensive delivery of career education to elementary and secondary school students. Such legislation should incorporate:

   a. provisions that establish the State educational agency as the responsible agency for planning the use and administering the expenditure of funds;
   b. provisions for requiring a State plan that sets out its career education objectives and activities;
   c. provisions for the employment and training of State coordinators of career education and other staff members to provide leadership to local educational agencies;
   d. grants to local educational agencies by the State for developing and implementing career education functions that include infusion of career education into the curriculum, guidance and counseling, employment and training of career education coordinators at system-wide level, inservice education of teachers, counselors, school administrators and school board members and purchase of instructional materials and supplies for career education; and
   e. actions that advance collaborative efforts between the school and the broader community.

The Council believes that elementary and secondary schools have sufficient experience to move career education from demonstration to implementation. Federal financial support to do this is required by State and local school agencies.

2. *That Federal legislation be enacted that encourages postsecondary educational institutions to engage in demonstration and model building career education.* Such legislation should incorporate:

   a. direct financial grants to postsecondary educational institutions and associations of such institutions for planning career education activities, demonstrating their merit, evaluating their results and communicating effective practices;
   b. provisions for faculty inservice education and development in the career education mode;
   c. provisions for curriculum building that harmonizes occupational learnings with undergraduate education courses;
   d. provisions for assessing career education needs of students within the postsecondary educational institution; and
   e. provisions for augmenting the delivery of career counseling and placement services to students.
   [Financial support should be given for increasing the number of professionals employed in these services, upgrading their skills, updating career information systems, designing programs for minorities, women and handicapped clientele, and securing the involvement of business, labor and government.]

The Council believes that the diversity represented in postsecondary educational institutions requires demonstration and model building career education projects as a necessary first step.

3. *That Federal legislation be enacted that addresses the needs for career education among special populations.* Efforts made under current legislation, given its limited financial resources, cannot respond adequately to the career education needs of special segments of the populations, such as the physically and mentally

handicapped, low-income persons, minority persons, women, gifted and talented, adult and older workers. The Council believes that funds should be appropriated to advance career education among such target populations.

4. *That educators and others continue to examine the concept of career education, its definition, purposes and implications.* Criticism and theory building are encouraged because they lead to better educational efforts beneficial to both youth and adults in understanding and capitalizing on the changing relationships between education and work that exist today and are certain to increase in the years ahead. Career education is an evolving concept. The free flow of ideas about its meaning, scope and implications for societal change is fundamental if career education is to be advanced. The Council does not view career education as a fad fashionable only because unemployment is high among youth and adults.

5. *That educators maintain and intensify their efforts to clarify the relationships between career and vocational education.* All too often, the public's conception of career education is that it is vocational education. Among the differences to be noted are that vocational education is confined to non-baccalaureate preparation emphasizing vocational skills required for entry into the labor market. Career education is directed toward all persons at every educational level. It is concerned about unpaid work as well as paid employment, with equipping persons with adaptability skills as well as specific entry job skills. The Council believes that public misperceptions of career education limit both career and vocational education in their efforts to assist people in making transitions from school to work and work to school.

6. *That the Office of Education, State educational agencies and local schools intensify their efforts to make career education a collaborative undertaking involving education and the broader community.* Experience documents that schools that have vigorously sought to incorporate business, industry, labor, government, community youth organizations, and families in the planning, policy making, and conduct of career education efforts have been more effective. The Council reaffirms its belief that career education is not, and should not be, something that school systems do by themselves.

7. *That the Office of Education, State educational agencies and local school districts set aside between five and ten percent of any allocated career education funds for assessment, evaluation, and dissemination of career education activities.* Evidence that demonstrates the effectiveness of career education activities is not only urgently needed but is a responsibility that professions have to the public that makes possible such educational endeavors. Assessment and evaluation procedures at the local level may well incorporate a variety of approaches including norm and criterion behaviors. The Council believes that both process and product evaluation efforts are highly important. The need for long range, longitudinal evaluation designs must not prevent educational professionals from engaging in meaningful short-term evaluation efforts.

8. *That the Office of Education provide professional and supporting staff to the Office of Career Education and the National Advisory Council that enables them to function effectively.* The Office of Career Education is woefully under-staffed given its present work load and responsibilities. Recently enacted career education legislation adds considerable further responsibilities to both the Office of Career Education and the National Advisory Council.

9. *That the Office of Education provide staff and funds to the Office of Career Education to establish and implement collaborative relationships on an intra- and inter-agency basis within the Federal Government.* Informative and cooperating structures should be created between the Office of Career Education and other parts of Health, Education, and Welfare, between the Office of Career Education and Departments of Labor, Commerce, and Defense, and between national advisory councils sharing common interests and concerns about the National Advisory Council for Career Education.

10. *That the position, Director, Office of Career Education, be established at the GS-17 level within the Office of Education.* The Council regrets that despite the fact that two years have

elapsed since passage of P.L. 93-380, the U.S. Office of Education has yet to create either the position or to specify its grade level.

11. *That the Office of Education initiate planning to conduct a second national conference for career education.* The Commissioner's National Career Education Conference held in Houston, Texas, in November 1976, was an effective vehicle for demonstrating the progress and achievements of career education. Career education does not have a national organization to represent its constituency; therefore, a national conference with leadership provided by the Office of Education makes it possible for the diverse groups and individuals in career education to exchange and build upon ideas and practices.

SUMMARY OF COUNCIL ACTIVITIES

Council Meetings and Objectives

The National Advisory Council for Career Education convened six times during the 1976 calendar year. All these meetings, open to the public, were held in Washington, D.C., except for the public hearing conducted in Houston, Texas, at the Commissioner's National Conference on Career Education. Complete transcripts of these six meetings are available from the Office of Career Education. Topics focused upon at these meetings included (1) legislative proposals, (2) national assessment of career education, (3) career education endeavors within federal agencies, (4) the Commissioner's National Conference on Career Education and (5) activities of the Office of Career Education.

The National Advisory Council adopted the following objectives to guide its activities for 1976:

- Objectives mandated by Section 406, P.L. 93-380:

1. To advise the U.S. Commissioner of Education on the implementation of Section 406 of Public Law 93-380, and to carry out such other advisory functions as it deems appropriate, including reviewing the operation of Section 406 and all other programs of HEW Division, pertaining to the development and implementation of career education, evaluating their effectiveness in meeting the needs of career education.
2. To determine the need for further legislative remedy in order that all citizens may benefit from the purposes of career education as prescribed in Section 406.
3. To assess the current status of career education programs, projects, curricula, and materials in the United States and to submit to Congress a report on this assessment.

- Related objectives proposed by the Council to require priority attention:

1. To examine career education needs and opportunities at the postsecondary level of education and formulate recommendations, if necessary, for legislation.
2. To improve the status of career education through clarification, validation, and articulation of the definitions and concepts of career education.
3. To promote evaluation of the effectiveness of career education efforts.
4. To encourage participation of States, related Federal government agencies, and business, labor, professional and community organizations in the implementation of career education.
5. To develop a career education professional development plan.
6. To articulate the relationship of career education to the back-to-basics movement in education.

Testimony

The National Advisory Council for Career Education was invited to offer testimony before the Subcommittee on Elementary, Secondary and Vocational Education, House Subcommittee on Education and Labor. Bruce Shertzer, Chairperson, presented the Council's recommendations on H.R. 11023 to this Subcommittee on February 2, 1976.

Subcommittee Reports

Much of the work of the Council has been conducted by subcommittees established by the Council for specific purposes. For example, the National Survey and Assessment Report Subcommittee, with Larry Bailey as Chairperson, completed its work with the publication and distribution of *Career Education in the Public Schools 1974-75: A National Survey* (American Institutes for Research, 1976). The reports of the three Subcommittees of the Council are summarized here briefly.

Legislative Subcommittee

In the November 1975 *Interim Report with Recommendations for Legislation*, the National Advisory Council for Career Education submitted a proposed design for legislation which, as indicated at that time, was not intended to be comprehensive. Rather it was addressed to the areas of greatest immediate need. The essential focus was on elementary and secondary schools, for it was in this sector that the legislative process called for prompt articulation with other legislation. The design was viewed as an incremental measure, enlarging slightly upon the actions of Congress in 1972 and 1974.

The authorities which were recommended in the proposal were essentially those of staff development and capacity building at the State and local levels, leadership identification at those levels, community engagement in planning, statewide evaluation, and the installation of a network of informed and committed professionals flowing from the Federal level, through the States to the school districts and classrooms. This was a straightforward design for structuring educational reform, limited to the elementary and secondary level, and concentrating on readying the system for more comprehensive implementation legislation. These recommendations are substantially embodied in H.R. 11023 and are still warmly endorsed by the Advisory Council.

Those initial recommendations, however, did not specifically address two areas in which the Advisory Council now believes needs and opportunities are becoming increasingly evident, namely, in postsecondary and adult education. Similarly, the 1975 recommendations gave only modest attention to the role of business, industry, labor and the community. It also is becoming clearer that to achieve the potential reform which is inherent in the career education concept, a greater degree of comprehensiveness must be incorporated into the design. The base will need to be expanded to include the participation of those groups—business, industry and labor—as well as the involvement of the full community in a legitimate decision-making role. Other areas in which no recommendations were made in 1975 were on advisory councils, curriculum development, manpower projections, and placement services, all vital features of this relatively young, yet flourishing concept. For career education to reach its recognized potential, new key themes shall now have to be considered and should be embraced in future legislative language affecting career education.

General Recommendations:

1. Comprehensive services and curriculum addressing the totality of learners from early childhood to adult and continuing education.
2. The engagement of the community, including business and labor, with the schools and colleges to facilitate and enrich counseling; to provide systematic work experience in the laboratory of the workplace; to contribute to policy development with institutions in the necessary building of bridges between the school and college and the working society.
3. Faculty development, at all levels, to articulate the formal academic program with the occupational and leisure values implicit in all teaching and learning. The *infusion* of work-related outcomes into academic learning has already been illuminated by Congress in existing law and should be sustained in any future legislation on the subject.
4. Transition from demonstration and dissemination mode (Phase I) to implementation mode (Phase II) at the elementary and secondary level, with direct fiscal support to local educational agencies through States.
5. Initiation of the demonstration and dissemination mode in support of career education at the postsecondary level (Phase I), corresponding to the pattern of initial support for elementary and secondary schools in the 1974 Amendments. This should lead in future years to a Phase II stage of support for postsecondary education, assuming the Phase I activity shows promise.

The Advisory Council's message surrounding current legislation, as above, has been presented in correspondence earlier this year from the Chairperson of the National Advisory Council for Career Education to key members of Congress who have been involved with career education. The thrusts of these communications were that, during the 1976 Congressional year, legislation should seek a reconciliation between the House and Senate to achieve comprehensive support for career education at elementary and secondary school levels and at the postsecondary and adult levels. It was recommended further that the Conference take particular note of the specific substance of the House version (H.R. 11023) as distinct from the general treatment prevailing in the Senate version (S. 2657). The correspondence called attention notably to the capacity building features contained in Sections 5 and 6 of the House version and urged specific attention to staff development and the design of a network of career education personnel at the State and local levels.

As we comprehend the effect of the Conference Committee efforts, concluded on September 24, 1976, and subsequently enacted into law a number of our recommendations appear to have been respected. However, the 1976 enactments have not yet afforded general implementing support for elementary and secondary schools, sustaining only a continuation of *planning* or *dissemination*.

As the Congress resumes its attention to career education in 1977, we urge favorable consideration of Congressman Perkins' initiative as embodied in H.R. 11023, together with the comprehensive aspects afforded in the enactment of 1976, deriving from Senator Hathaway's amendment in S. 2657.

On the subject of fiscal appropriation patterns, the Advisory Council has favored that found in the original Senate bill. It also acknowledges the desirability of encouraging substantial State and local fiscal responsibility for the advancement of career education and recommends funding at no less than $75 million annually, in addition to sums authorized in the 1974 and 1976 enactments. The general support for elementary and secondary schools should be contingent upon demonstrated commitment by States of at least the sum being sought from this authorization.

Specific recommendations affecting postsecondary education:

As legislation concerning career education is extended to support career education at the postsecondary level, the following four generalizations are offered for the guidance of Congress:

1. Every effort should be made to instill the theory of *infusion* in postsecondary education as has been done in legislative language affecting elementary and secondary education. The present tendency of young people in college to shun the liberal arts in pursuit of more immediate perceived satisfactions in the occupationally-related curriculum is totally incompatible with the purposes of higher education. The college experience, now virtually an entitlement to America's young people, as a result of congressional vision, should be substained as the setting for the development of an enlightened citizenry, enriched by the humanities and the sciences quite apart from jobgetting. The values implicit in the liberal arts experience must be sustained and enhanced in the present overly-pragmatic orientation of students, or we submit to a materialistic culture void of the spirit-freeing force that higher education in America has been. This calls for resources to encourage faculty development in the career education concept, through which the relatedness of the liberalizing curriculum to the subsequent economic and social existence of the learner can be made clear. Institutions interested in faculty development should be able to obtain funding, based upon plans and applications submitted to the Commissioner of Education.
2. The existing structure for serving individual students in their search for occupational goals relating to curricular offerings resides in the institution's Career Planning and Placement Officer, or similar title. This function in most institutions, both two-year and four-year, is undervalued when placed in competition with the academic faculty and the more established administrative areas of students services. Legislation should encourage the establishment of career planning and placement services for all students, perhaps through matching grants, consistent with criteria to be established by the Commissioner. The training of such officers in the subtle and complex professional duties of their office should likewise be supported.
3. The legislation should encourage a continuum of counseling services between the secondary and postsecondary institutions to afford greater articulation surrounding the career development of individuals. The perceived dichotomy in present legislation between the career education authorities at elementary-secondary level and postsecondary level should be corrected, in the domain of counseling and career guidance, as well as in curriculum and program offerings.
4. Legislation should encourage institutional research in the field of manpower needs and college outcomes, particularly through follow-up attention to graduates and their occupational circumstances for shaping career counseling policy. On this matter, the National Advisory Council recommends that

efforts be made to determine nationally what is happening to the college graduate, short term and long term, upon leaving the campus. Considerable emphasis is justified on finding out just how much unemployment and underemployment are being experienced by graduates in what disciplines and what areas of the country.

(Sidney P. Marland, Jr., Chairperson)

Subcommittee on the Clarification of Career Education Concepts

Recognizing that career education is an *evolving* process, the subcommittee has begun to explore various expanded conceptions that provide a wider base for further legislation, research and development, training and implementation.

The subcommittee has initiated an examination of the areas of agreements and disagreements related to the current conceptualization of career education. For example, for the most part, there appears to be consensus on such matters as the fact that career education is a conscientious effort, nor is it merely an attitude or point of view; that it includes activities beginning no later than grade one and continuing through adult education; and that it is intended to serve all rather than a special segment of the population. There also appears to be agreement, on the surface at least, that vocational education is one of several important parts of, but is not synonymous with, career education. Further, there is substantial agreement that career education itself is only part of, not synonymous with, education and, as such, is to be integrated into the total educational program rather than being "added on."

On the other hand, disagreements continue to relate to the primary rationale behind the concept and to some of its long-range goals. Controversy exists over the need to improve the quality of school-to-work transition and a view of career education based on the need to restore the work ethnic. Some practitioners focus their rationale on the need to help those who leave the educational system in finding satisfying and socially beneficial employment. Their thrust is on helping people prepare for, enter, and progress in an occupation. Others center career education around the need to make work possible, meaningful, and satisfying to each individual.

This subcommittee, in short, is exploring various conceptions including those based on work, broader views based on self-development, and still broader views of career education for life. Concepts appear to vary according to the following emphases: on paid work as opposed to a focus on life career; on occupation and educational information as opposed to focus on the individual; on market and manpower needs as opposed to individual decision-making; on adjusting people to the status quo as opposed to helping them develop their potential for improving society; on occupational choice and job placement as opposed to a focus on process and life-span; and on the economic role as opposed to integration of the work role with other life roles.

The definitions being reviewed vary according to their sources, with the main ones emanating from vocational education, vocational guidance, and from Federal and State education agencies. Those from vocational education sources appear to put most emphasis on preparation for paid work, placement, skill training, and work experience. (Those from vocational education sources appear to put most emphasis on preparation for paid work, placement, skill training, and work experience.) Those from vocational guidance put more emphasis on self-awareness and development, information-processing and decision-making, the planning process, and integration of various life roles. Definitions from Federal agencies (USOE, NIE), tend to stress the economic role, work experience, occupational clusters, and preparation for paid employment. Definitions from State agencies appear to be a mixture of economic role orientation and career development/life-role orientation, although the approved definition of the Council of Chief State School Officers appears to be in the broader direction. There is noticeable absence of definitions from leaders in curriculum, academic disciplines, teacher education, and their formal associations.

The subcommittee believes that it is fair to say that there still is confusion in career education terminology, particularly as it relates to the terms "career," "work," "career development," "career guidance," and "vocational education."

The subcommittee is studying a paper prepared for the Council by L.S. Hansen, who has urged a definition based on career development theoretical models and such concepts as developmental tasks, multiple talents and roles, changing individuals in a changing society, adequate assistance and information through counseling, exploratory experiences, and career resource centers. In this conceptualization, a number of principles have been suggested. These are that the conceptions might: take into account the changing nature of both individuals and the environment and the need for flexible and adaptable people; integrate into its aims the twin goals of development and experience; build on a rationale of the best knowledge available in career development theory and research; identify a sequential kindergarten-to-adult set of objectives as a basis for exposing everyone to a wide spectrum of career knowledge, information, skills, and attitudes; provide for a wide range of community involvements, paid and unpaid, including alternative education-to-work linkages, business/labor/industry/government internships and exchanges, parent and worker involvement in schools and student involvement in community; acknowledge that many occupational clustering and career information system can be utilized to assist in acquiring, knowing, and processing information; recognize the central place of counseling and guidance as part of the delivery system; recognize the importance of "role integration" and for individuals to clarify their values with respect to the meaning of work in their lives; reaffirm the importance of helping individuals in the transition from school to work, school to further education, and school to other alternatives; stress the importance of attending to special needs of bypassed and underserved populations; be viewed as a response to crises in education but as a comprehensive concept of human development; and be conceived as a time-oriented concept which recognizes that it can help individuals not only prepare for the future but see the relationship of the future to the past and present.

(Thelma Daley, Chairperson)

Subcommittee on Career Education Beyond Secondary Schools

Recognizing that career education is an *expanding* process, the subcommittee has begun to investigate areas in which growth and development seem both natural and logical. Hence, the subcommittee, in exploring the status of postsecondary career education is studying experiential education and community involvement practices, exemplary education programs in a variety of settings, and the status of career education for adults.

The concept of career education, by and large, has been associated primarily with elementary and secondary education. Faculty and academic administrators, particularly those at postsecondary institutions which place major emphasis on research, sometimes tend to be troubled by what they perceive to be the non-academic cast of career education. This subcommittee recommends an approach which would pay much greater attention to developing a positive relationship between academic and career education.

This subcommittee will explore in depth the findings of survey and research studies that have been commissioned to identify and examine a wide range of relevant matters, such as work experience programs and their relationship to career education. Moreover, the subcommittee is examining a number of conceptual propositions, e.g.: unlike elementary and secondary schools, there is a considerable disparity at postsecondary institutions between those elements that are considered part of the "academic" component of the institutions and those considered in the category of "support services."

The subcommittee also will consider the *specific profiles* of exemplary programs at a variety of institutions: 2-year, 4-year, vocational/technical and liberal arts, those with large and small enrollments and program participants, both urban and rural, public and private.

The subcommittee plans to analyze case studies of cross-institutional patterns regarding postsecondary practices. Patterns of participation in career education practices and their relation to curriculum reform and educational policy are being identified; these will be related to common perceptions and definitions of career education with the focus on clarifying what career education "is" at this level.

There is, then, clearly an emerging need for a conceptual map of career education conducted in postsecondary educational institutions in order to facilitate understanding of that which is most needed and helpful at this time.

(Marion LaFollette, Chairperson)

Commissioned Papers

The National Advisory Council commissioned eleven (11) papers in June 1976, to advance its work. By means of these documents, the Council seeks to gather information that will increase the effectiveness of its activities and close certain knowledge gaps for the Office of Career Education. These papers were linked to certain Council objectives set forth above. The title of the papers and principal investigator have been presented under the objective to which they are related:

To improve the status of career education through clarification, validation, and articulation of the definitions and concepts of career education:

1. "An Examination of the Definitions and Concepts of Career Education," Lorraine Sundal Hansen, University of Minnesota.
2. "Involving Parents in Local Communities in the Clarification of the Concepts of Career Education," Robert Woerner, National Congress of Parents and Teachers.

To examine career education needs and opportunities at the postsecondary level of education and formulate recommendations if necessary for legislation:

3. "A Study of the Current State of Career Education at the Postsecondary Level," Michael B. Goldstein, University of Illinois at Chicago Circle.
4. "Profiles of Exemplary Postsecondary Education Programs," David Paul Rosen, National Student Educational Fund.
5. "Career Education for Adults," John Richard Valley, Educational Testing Service.
6. "Experiential Education and Community Involvement Practices at the Postsecondary Level: Implications for Career Education," Robert F. Sexton, University of Kentucky.

To encourage participation of States, related Federal Government agencies, and business, labor, professional and community organizations in the implementation of career education:

7. "Issues and Strategies for Enhancing the Participation of Labor in the Implementation of Career Education," Mark Schulman, Antioch College.
8. "Issues and Strategies for Enhancing the Participation of Business and Industry in the Implementation of Career Education," Gene Hensley, Education Commission of the States.

To develop a career education professional development plan:

9. "Strategies for Developing a Career Education Professional Development Plan," William Weisgerber, Michigan State Department of Education.
10. "A Guide for Developing Career Education Plans by Local School Administrators," Grant Venn, Georgia State University.

To promote evaluation of the effectiveness of career education efforts:

11. "Using National Assessment Results for Career and Occupational Development in Career Education Planning," Charles L. Lewis, American Personnel and Guidance Association.

Public Hearing

The National Advisory Council conducted a public hearing (November 9, 1976) on career education at the Commissioner's National Conference on Career Education. Some 158 persons attended the session and twenty individuals presented testimony. The major recommendations abstracted from these statements included the following wide-ranging concerns:

1. that career education programs include college bound, academically talented students and, particularly, those in the performing arts;
2. that research be undertaken to determine strategies to enable junior high schools to relate their curriculum more closely to conditions affecting the local world of work, "particularly in those areas where

agriculture demands increasing quantities of small unit energy sources (i.e., children);"

3. that the USOE develop a handbook for teachers who are confronted with problems of infusing world of work materials into the junior high school curriculums;
4. that a careful assessment and application of child labor laws be considered (within the appropriate protective stimulations of such laws).

   [Specific ideas to be viewed were: "the use of workmen's compensation as an umbrella including learners; an insurance industry-educator study of learner relationships to the workplace; and the nature of youth's own responsibility as they approach age 18 as an integral part of their learning and transition to adulthood."]
5. that the term "life options" be used in order to more adequately describe programs intended to meet the needs of individuals, communities, and commerce;
6. that the issues of discrimination of women be addressed more directly in career education;
7. the USOE provide information to institutions of higher education regarding public and private funding sources for the development of career education;
8. that the Advisory Council support the funding of career education within teacher training, particularly in the area of values for teachers who work with black and migrant communities;
9. that, given the limited amount of available career education funding, it would be more cost effective to reduce the number of project recipients while lengthening the period of cycling.

   ["What is required is longer time periods for districts and institutions to develop and demonstate their programs."]
10. that greater attention be given to the problems of career education in correctional centers;
11. that greater attention be given to the need for career education programs for the deaf;
12. that the Advisory Council encourage the proposal that all high school students take a course on how business operates; and
13. that vocational education be considered a strong component of career education.

Future Directions for Career Education

During the year, the National Advisory Council examined possible "next steps" in career education. Four members of the Council presented papers that suggested future directions for career education. The basic intent of these papers was to stimulate and focus discussion among members about the needs of and priorities to be given to career education. Abstracts of these papers have been reproduced below.

CAREER EDUCATION: WHAT NEXT?

John Porter
Superintendent of Public Instruction
Michigan State Department of Education

Basic problems are evident that prevent career education from completely fulfilling its potential of bringing schools back in touch with the mainstream of American life. They are that: formal teaching and learning tend to take place in school buildings rather than in conjunction with the community; employment tends to take place away from school buildings and with little relationship to the curriculum; and except for peripheral job opportunities, youth tend not to be a highly sought after labor group, particularly in times of double-digit inflation and high unemployment.

In order to address these problems, substantive national, State, and local policies are needed. Two priorities stand out: to establish a durable National Employment Policy and a National Youth Policy. Creation of both would give meaning to career education.

In Michigan, the term career education is being used as the rubric to deal with these issues and to bring about certain critical reforms in elementary and secondary education. Because basic reforms are being dealt with, the definition of career education cannot be limited to vocational preparation or to the world of work. The approach being followed is to determine the educational health of the schools.

Traditionally, schools were established to screen, sort, and select students. Now, however, the movement is toward assisting, analyzing, and articulating student needs. Because of this, all instructional specialists are being asked to develop instruments that will provide a valid and reliable needs assessment in their areas. Traditionally, it was seldom known what was actually happening in schools as a result of ten months of instruction. Now, however, a new plan of action is being developed. Eight specific policy changes are being proposed:

- Each school should establish a Neighborhood Citizens Council involved in the setting of goals.
- Each school principal provides staff leadership and is responsible for controlling the budget set aside for that purpose.
- Each staff person is required to identify at the start of the school year the basic expectations for the class.
- Each student, for each school activity, should be administered a basic needs assessment to be viewed against expectations before instruction begins.
- Each school should have a concrete system for identifying students who are falling behind and a reporting system for parents.
- Each school district's report cards and evaluations should be redesigned to relate to student expectations.
- Each school should have a means for a thorough assessment of basic accomplishments for each student at the end of the year, and where the goals are not attained, provide for extended summer schooling.
- Each school district should eliminate time considerations as the controlling factor in the teacher-learner process.

Changes in these areas would move education from the "old" method to a "new" way, utilizing new instructional models being developed. It also would place education in the mainstream of what every citizen seeks, namely, the American Dream—economic security, housing, health, and education.

Career education is a powerful concept for bringing about fundamental change in education, but it must be viewed differently. It must be viewed (1) as the connector of and link among such special interest delivery systems as general education, compensatory education, vocational education and special education, (2) as the vehicle which helps individuals recognize their own unique capabilities and then discover options for future placement, which best maximize those capabilities, and (3) as a vehicle for retraining staffs so they could utilize existing resources more effectively. On the other hand, career education *must not be viewed* as simply a program or separate course, nor merely a system put on top of an already overly bureaucratic system of texts unrelated to expectations, tests unrelated to what is being taught, and student evaluation unrelated to reality.

Four fundamental steps should be taken to elevate career education to its rightful place in the vocabulary of educational change:

1. that schools would know that they have career education only when they can specify what is expected of students in every course, subject, and grade;
2. that schools would know that they have career education only after they begin to assess student needs before instruction and to assist students in articulating what was originally identified as being reasonably expected;
3. that schools would know that they have career education only after they have redesigned their reporting systems to relate them to what was originally expected, in terms of the effectiveness of the instructional process; and
4. that schools would know that they have career education only when, at each level, they relate to the "market place" the life role expectations which they have adopted as educational goals.

If these actions were taken in the name of career education, it would be evident that only one major expense would exist, namely, retraining personnel. Only after we have sharpened up what the schooling process can accomplish will we be able to enter into a business, industry, labor and education social contract for job opportunities for American youth.

NEXT STEPS FOR CAREER EDUCATION

Sidney P. Marland, Jr.
President
College Entrance Examination Board

To date, career education has had its major focus at the elementary and secondary school level. It is proposed that the National Advisory Council, as it performs its statutory mandate as an advisory body, now address itself more directly in two other sectors, namely, (1) postsecondary education and (2) adult and continuing education.

Although at times they have used terms other than career education, several recognized leaders in postsecondary education are beginning to recognize the emerging career education concept as a reality in the evolution of postsecondary educational objectives. For example, the following spokespersons all recently have written in recognition and support of this direction: Willard Wirtz of the National Manpower Institute, Stephen Bailey of the American Council of Education, Glenn Dumke, Chancellor of the California State University system, and Clark Kerr of the Carnegie Commission on Higher Education.

From these sources, and others, the following four assumptions can be drawn:

1. that the education and work relationship is now coming into place in our colleges and universities;
2. that those postsecondary institutions are facing a time of public disenchantment;
3. that students, including adults, increasingly expect utilitarian outcomes from their education; and
4. that career education will be facilitated in its influence on postsecondary education by Federal initiatives, including research as well as enabling legislation.

Based upon these assumptions, it is proposed that the National Advisory Council for Career Education consider formulating relevant recommendations to be addressed to the United States Commissioner of Education, the Director of the National Institute of Education, and appropriate congressional committees.

The following nine basic next steps, therefore, were proposed, some of which would require the commissioning of necessary in-depth studies and research:

1. address the recurrent and stubborn problem of manpower needs, especially as articulated with college undergraduates;
2. determine the state-of-the-art in a broad and varied sampling of colleges and universities in order to gain insights into current levels of education and work relationships;
3. assess the needs of postsecondary institutions regarding student expectations for career education;
4. provide initial seed money for the development of faculty in the career education mode, especially to serve liberal arts and humanities;
5. develop, through facilitation legislation, models of postsecondary curriculum development in order to harmonize occupational learnings with undergraduate general education;
6. engage the resources of professional associations in determining procedures for institutionalizing career counseling in colleges and universities;
7. conceptualize an uninterrupted system of permanent records of career counseling and placement functions, commencing at the middle school and continuing through college and adult education;
8. develop the role of career counselors for colleges and universities, affording training and materials for implementing an enlarged function in response to students' expectations as well as faculty needs; and
9. stimulate processes and materials for the design and administration of practical evaluation of career education by States, local districts, and postsecondary institutions.

NEXT STEPS FOR CAREER EDUCATION

Professor Larry J. Bailey
Department of Occupational Education
Southern Illinois University at Carbondale

The four next steps outlined for career education are primarily conceptual and are directed to the Office of Career Education, the National Institute of Education, to career education at large, and to the National Advisory Council for Career Education.

The foremost step is to reiterate a commitment to educational reform—only one approach to which is career education. Because education has persistently resisted reform, we need to understand why this is so. It is helpful in this regard to recognize the various levels of change. Five such levels can be identified: *Substitution* (e.g., replacing one instructional element with a new one); *Alteration* (alternate content and new instructional methods), *Perturbations and Variations* (temporary shifts in a system); *Restructuring* (modifying and reorganizing a system); and *Value Orientation Change* (understanding and adopting idea systems, thought models, or conceptual frameworks and assumptions which underline a concept). Career educators must not settle for too little. They should always remember that programs can be implemented without education being truly reformed. Basic reform implies a more thorough shift, for example, from the concepts of schooling to education, from teaching to learning, from content to process objectives, and from singular to pluralistic delivery systems.

A second conceptual step concerns the question of "ends" and "means" and the need to differentiate between them. While education traditionally has been, and continues to be, preoccupied with "means" (content and instruction), there is now a pressing need to shift curriculum development to a greater awareness and concern for "ends" (goals and objectives), that is, to place major emphasis on objectives, in this case, on student learning outcomes.

The significance of this reasoning is the matter of priority i.e., "ends" should always precede "means." This requires that objectives should be identified prior to selecting the activities and materials to be used. As simply as this basic principle is, it is almost always violated in practice. An example is the so-called infusion approach to career education. In this approach, teachers utilize topic, activities and materials drawn from the world of work to *infuse* the conventional subject areas. It is the ends of instruction, not the means, which should determine whether or not a given activity is career education.

The implication of this, in terms of *next steps,* is that two different, albeit legitimate, roles should be identified for career education. The *primary role,* to facilitate career development, involves identifying career development learning outcomes. Curriculum can be developed to facilitate such objectives.

The *secondary role* involves using activities and materials from the world of work to make academic subject matter more relevant, for example, using occupational information to teach reading. One can be successful in teaching reading through occupational information without ever assisting a student to make a personally meaningful educational or occupational decision.

This is more than a matter of semantics. Facilitating career development learning outcomes and employing infusion techniques are both important. However, their relationship is not of equal importance. The former is what career education *should* be all about; the latter is simply "good teaching."

The third step is to suggest that career educators assume a more active leadership role in the redefinition of educational purpose and, moreover, bring together the many other educators who are similarly concerned with the view which emphasizes learner outcomes (no matter what differing terminology they may be utilizing). The new prominence of humanistic theories has important implications for career education. Theorists and practitioners have much more in common than it sometimes seems. Because there appears to be considerable consensus for the humanistic point of view, it would seem that emphasis should be placed upon the commonalities, not the differences, in thinking about career education. The basic foundation, therefore, which could lead to a true reform of education are at hand.

Theory building and validation in career education must continue along with implementation. Simply because a position has been presented, there is no reason to drop theory building and take up solely with application. The dialogue among theorists in career education must continue, but it must also continue between them and other behavioral scientists. Further, we must recognize the existence of more than one career education theory, and with it, the existence of legitimate criticism. The latter should not be feared but always must be considered.

The final point, addressed specifically to the National Advisory Council, is simply that the Council should continue to take a stand on substantive issues and matters effecting national educational policy. The Council ought not attempt to be all things to all people; it should lead, not follow; it should do what others are not doing. Basically the Council ought to identify and address those issues which threaten to thwart career education during its formative period, for example, (1) the "back to basics" movement which conceivably could narrow the ends of the educational process, and (2) the declining nature of the educational enterprise (enrollment and funding) which threatens to jeopardize career education before its impact can be truly felt.

NEXT STEPS IN CAREER EDUCATION:

WILL THE OPPORTUNITY FOR REAL REFORM BE LOST?

Charles L. Heatherly
Director of Education
National Federation of Independent Business

Viewing the career education scene from the perspective of a concerned citizen, a certain uneasiness is felt over the future direction the movement might take. This is not caused by any particular event but from the ambiguities and compromises which afflict career education. Based on a coalition of reform agents, the movement appears to suffer from not having a philosophy of its own. A diversity of career education concepts is to be expected, but unless the varied interests share a common vision of alternatives and can forge a common consensus, the reform goals will not be attained. Reform movements normally alter institutions without transforming them and career education advocates cannot realistically expect total success.

Career education is viewed as a "movement" because it appears to be an expression of a broadly-based coalition rather than a program espoused by any one segment. Its strength grows from its power to speak to the varied yet consonant concerns of a number of diverse groups. Its future will depend on maintaining the coherence of its programmatic thrust. Whether or not it will achieve its major goals is still uncertain and the proposition that career education "is a reform, not another add-on" has still to be fully implemented.

In terms of the definition of career education, it would be difficult to improve on the one articulated by Kenneth Hoyt. By focusing on the centrality of the concept of *work*, Hoyt recognized the need for limiting the scope of career education while encompassing enough territory to render both possible and meaningful the governance of this new domain.

It is important to reemphasize constantly the differences between vocational and career education which often are ignored, particularly in State and local programs. Robert Rossi of the American Institutes for Research has some relevant perception of these matters. Rossi has clarified definitions of "education," "career," and "work" which emphasized the crucial elements of *choice* and *planning* which, in turn, distinguish career education from vocational training.

Another area in which significant tensions and difference emerge is with the liberal arts whose leaders often find power based upon a mixture of tradition, obscurantism, and coercion, the latter in the form of budgets. The hostility of liberal arts schools toward career education comes from several sources. Much of it is a misperception of career education as vocational education. As a result, career education often is dismissed lightly.

While there will always be tension with the liberal arts, there is no reason why this should erupt into open warfare. The liberal arts can be integrated into the framework of career education starting in the middle grades.

In addition to the above concerns, other serious problems exist, which are viewed here more directly from a business and industry standpoint.

From the American Institutes for Research report it appears that although many career education ideas have gained acceptance, the actual measurable impact on students has been minimal. This is not surprising because this reform movement is relatively young. In agreement with Hoyt's position, it is felt that we must make use of traditional achievement measures to demonstrate the efficacy of career education efforts. Also, the use of data from the National Assessment of Educational Progress's Career and Occupational Development tests should assist State and local education agencies in evaluating instructional strategies and materials. More "hard" proof of career education's efficacy is needed.

A related issue is that of the decline during the past decade of achievement scores and the fact that this has gone hand-in-hand with increased educational expenditures. Although career education strategies can lead to more effective use of resources through an improvement in basic education, established proof of this will take time. Were data available to support this relationship, a better case could be made to mobilize the support of parent groups and other allies.

While the participation of business and industry continues to grow, it is impossible to measure this accurately. Although many of the efforts at the national level have not filtered down to local communities, the interest and commitment from business is rising, especially for job-oriented programs. Small business enterprises, because they are small and very independent-minded, are not easily mobilized. Nevertheless, they are a tremendous reservoir of potential manpower and support, particularly for awareness and exploration programs.

We will know that career education has succeeded in forging the business/labor/community partnership when activities become institutionalized. The need over the next few years will be for a consolidation of business, industry, and labor activities into efficient and effective systems. There is much to be learned in such a closer collaboration of these groups. The involvement of small business entrepreneurs will enrich not only the education of youth but the lives of businessmen and women themselves.

Mr. **Meyer**. First of all, the responsibilities, as enumerted by Congress for us in the original legislation, indicated that we have two specific responsibilities. Number one, to survey and assess the status of career education nationally and, secondly, to make recommendations to the Commissioner of Education on directions that might be pursued legislatively within the career eucation framework.

We have accomplished both of those mandates at this point in time and continually update our responsibilities in those areas. We have had a number of meetings throughout our several years in existence. We have had some meetings in other parts of the country but mainly our efforts have come from Washington through meetings that we have had here in Washington. During this period of time, we have made a number of suggestions to anyone who wished support service with regard to legislation or individual states nationally to implement career education concepts.

We have, during that same period of time, identified a number of specific areas in which additional knowledge as needed in career education. As a result of those needs, we have prepared and printed a number of papers in regard to career education, 14 at this point in time, and we have another 11 to fill gaps within the knowledge of career education that we deem necessary. They are listed within the report also.

I would like to sidestep the report at this point in time and talk about a few concerns that I have in regard to the futherance of career education nationally.

I think your efforts congressionally have been outstanding as far as furtherance of career education is concerned. The legislation which has passed within the House is an outstanding piece of legislation insofar as the furtherance of that concept is concerned. It is no doubt a piece of legislation which, if implemented, will bring career education to the local school levels.

In my capacity as Chairman of the National Advisory Council on Career Education, I have had the opportunity to see, for the first time, the workings of the government at a national level and how suggestions are made and how legislation ultimately develops and so forth.

It has been an eye-opening experience for me and it has been a very productive experience.

In my everyday lifetime occupation, I am a teacher and administrator of the local career education programs within a small city school district in New Jersey. I have seen the productive efforts that have come about as a result of interest in and perpetuation of and establishment of career education programs within school systems of that type.

As a result of those experiences, I would like to express several concerns.

First of all, I do think it is important as this committee is in process of doing, reviewing all councils and reviewing what is happening, if goals are being accomplished and so forth.

As a result of that, it is apparent to me there have been recommendations made in consolidation of some of those councils.

I would hope, as elected representatives, you would be very conscious of both the positive and negative aspects of consolidation, elimination of any specific council.

From my vantage point of a hometown location, I have felt my avenue as an individual citizen to input into the Federal Government, Federal bureaucracy, has been through elected representatives and through members of various advisory councils.

I support very strongly the concept of involvement from the grass roots level, at all levels of government. I think it is extremely important that participation take place from all levels of individuals, county, local, block people, whatever is the terminology used. It is important that that take place. Advisory councils give all of us an opportunity to have some kind of input. Hearings of this nature give all of us an opportunity to have some kind of input. I strongly reinforce that concept and know that in your deliberations that serious consideration will be given to that area.

I think that an important aspect of education nationally has to be the relationship of schools and what goes on in the outside world. I feel strongly that career education and many of the other areas we have talked about here today are important in that effort. We must prepare or help our students make the transition from school to the real outside world. Career education provides that opportunity for our students. It is a concept that gets down to where the students are and that is really what we have to be talking about and that is really what we have to be concerned about. Education takes place between a student and a teacher and that relationship in my mind is the cornerstone of all quality education and that quality education must provide for that transition from school to the real world. Career education provides that.

I do have a concern and regard for the consolidation of some of the councils. It is my understanding that one of the proposals is the bilingual with career education. In my estimation that is so far beyond my understanding that I cannot comprehend the specific reasons for it. Bilingual education is not going to benefit from a move in that direction.

Career education is not going to benefit from a move in that direction and certainly the boys and girls we serve are not going to benefit from a move in that direction. I feel very strongly that the importance of—you know, as I sat here today and listened to the efforts of all these councils, I must tell you I am really impressed with the efforts of all of these councils as they presently exist. I am aware of budgetary constraints and concerns in that direction, but it frightens me a little to think that perhaps some of those consolidations are made for economic purposes and not for the purposes of education for our children, and I think that has to be our priority and I support the continuation, therefore, of at least career education in the same form.

There are other modifications that are possible, but I don't think it is going to help bilingual or career education to move in that direction. I thank you for the opportunity. I really appreciate it.

Mr. KILDEE. Thank you very much, Mr. Meyer.

We have been joined by another distinguisehd member of the subcommittee, Mr. Larry Pressler, and by someone who appears to be one of the youngest members of the Congress.

Next will be Mr. Martin W. Essex, Chairperson of the Community Education Advisory Council.

STATEMENT OF MARTIN W. ESSEX

[The prepared statement of Martin Essex follows:]

STATEMENT BY
MARTIN W. ESSEX
CHAIRPERSON, HEW COMMUNITY EDUCATION ADVISORY COUNCIL
BEFORE THE
SUBCOMMITTEE ON ELEMENTARY, SECONDARY
AND VOCATIONAL EDUCATION
COMMITTEE ON EDUCATION AND LABOR
U.S. HOUSE OF REPRESENTATIVES
WASHINGTON, D.C.
THURSDAY, AUGUST 4, 1977
9:00 a.m.

Mr. Chairman and Members of the Subcommittee:

It is my pleasure to appear before you this morning to review the functions and activities of the HEW Community Education Advisory Council.

The Community Education Advisory Council is established pursuant to the Education Amendments of 1974 (Public Law 93-380 , 20 U.S.C. 1864), Title IV, Section 405--The Community Schools Act. Additionally, the Council is governed by the provisions of Part D of the General Provisions Act (Public Law 91-230 ; 20 U.S.C. 1233 a et seq.) and of the Federal Advisory Committee Act (Public Law 92-463, 5 U.S.C. Appendix I) which sets forth standards for the formation and use of advisory committees.

The Council:

1. Advises the Commissioner on policy matters relating to the interests of community schools;
2. creates a system for evaluation of the program;
3. in the fiscal year ending June 30, 1975 was responsible for advising the Commissioner regarding the establishment of policy guidelines and regulations for the operation and administration of the program;
4. presents to Congress a complete and thorough evaluation of the programs and operation of this program for each fiscal year ending after June 30, 1976.

The Community Education Advisory Council is an eleven-member Council whose members are appointed by the Secretary of Health, Education, and Welfare. Members of the Council serve a three-year term. The legislation mandates that a substantial number of the Council members must be persons experienced in the operation of community education programs and the training of such persons, and also include representatives from various disciplines involved in providing services to community education programs, such as, educational, recreational, cultural and other related services. Thus, the Council provides the Commissioner with the insights of not only community educators, but a number of other disciplines which relate to community education and should be encouraged to work cooperatively in the development and operation of community education programs. Listed below are the current eleven members of the Council:

Donald W. Buchanan
Acting Dean
School of Health, Physical
Education and Research
P.O. Box 53
Mankato State College
Mankato, Minnesota 56001

Martin W. Essex
Executive Secretary
Ohio Vocational Education
Advisory Council
5900 Sharon Woods Boulevard
Columbus, Ohio 43229

Robert D. Gilberts
Dean, College of Education
University of Oregon
Eugene, Oregon

Clara S. Kidwell
Associate Professor
Native American Studies Program
University of California
3415 Dwinelle Hall
Berkeley, California 94720

Carol K. Kimmel
Trustee,Southern Illinois
University
1715 25th Street
Rock Island, Illinois 61201

Charles Stewart Harding Mott
Board Chairman and Chief Executive
Officer
Charles Stewart Mott Foundation
501 Mott Foundation Building
Flint, Michigan 48502

Theodore J. Pinnock
Director, Human Resources
Development Center
112 Knollwood Building
Montgomery, Alabama 36109

George W. Romney
Chairman of the Board
National Center for Voluntary
Action
1214 16th Street, NW
Washington, D.C. 20036

Richard M. Turner, III
Dean of Faculty, Habor Campus
Community College of Baltimore
Room 503 - North Building
Lombard Street and Market Place
Baltimore, Maryland 21202

Mabel R. Varela
Route 2, Box 47
Pecos, New Mexico 87552

Joanne C. Walker
Member, Dothan Board of Education
2506 Stonebridge Road
Dothan, Alabama 36301

Listed on the following pages is the budget breakdown as well as the personnel expenditures for staff support for the Community Education Advisory Council for Fiscal Years 1976 and 1977.

BUDGET BREAKDOWN FOR COMMUNITY
EDUCATION ADVISORY COUNCIL
FOR
FISCAL YEAR 1976
AND
TRANSITION QUARTER

Appropriation Fiscal Year 1976: $150,000

Category		Expenditures
Meetings		$ 23,894
(Four full Council meetings were held in Fiscal Year 1976. Following is a breakdown of expenditures for these meetings.		
(Travel	$12,581)	
(Honorarium	8,600)	
(FICA	491)	
(Payroll	156)	
(Recording Services	2,066)	
Travel		2,501
(Aside from travel expenses incurred for Council meetings (Council members only) travel was paid for nine consultants who were brought to Washington, D.C. for the purpose of making recommendations on a handbook on "Needs Assessment" which is one of the criteria which must be met by applicants applying for funds under the Community Schools Act.)		
Contract		2,500
(One contract was awarded to Mr. Arthur Boyd for the purpose of preparing a publication entitled "Evaluation Today in Community Education.")		
Printing		3,700
(The publications "Needs Assessment" and "Evaluation Today in Community Education" were printed by GPO.)		

TRANSITION QUARTER ($100,000 was carried over from Fiscal Year 1976 budget appropriation)

Appropriation: $37,500

Category	Expenditures
Meetings	$ 11,570
(Two full Council meetings were held during the Transition Quarter. Following is a breakdown of expenditures for these meetings) (Travel* $6,932) (Honorarium 4,200) (Rentals 116) (FICA Benefits 245) (Payroll 77) (*Travel for these meetings includes travel expenditures for the Council members plus one staff member who records minutes, arranges the conferences, etc.)	
Contracts	121,811*
(It was recommended by the Council that a series of studies be undertaken in order to further the concept of community education and to meet the needs of practitioners working in the field of community education. Thirteen small contracts were awarded for this purpose. Also one contract in the amount of $2,766 was made for the purpose of preparing the Council's Annual Report to Congress. Attachment A is a listing of the thirteen studies being done in the field of community education.)	
TOTAL EXPENDITURES FOR FISCAL YEAR 1976 AND THE TRANSITION QUARTER AMOUNTED TO:	$165,975

*$100,000 of this amount was carried over from Fiscal Year 1976 funds and was not committed until the transition quarter.

BUDGET BREAKDOWN FOR COMMUNITY
EDUCATION ADVISORY COUNCIL
FOR
FISCAL YEAR 1977

Appropriation Fiscal Year 1977: $150,000

Category	Expenditures
Meetings	$ 33,580

(Five full Council meetings were held in Fiscal)
(Year 1977. Following is a breakdown of expend-)
(itures for these meetings.

(Travel	$22,049	)
(Honorarium	10,300	)
(FICA	595	)
(Central Payroll	203	)
(Rentals	233	)
(Supplies	200	)

Contracts	100,000

The Community Education Advisory Council is mandated to create a system for evaluation of the programs funded under the Community Schools Act and to present to Congress a complete and thorough evaluation of the programs for each fiscal year ending after June 30, 1975. In Fiscal Year 1977, a major contract was awarded to Development Associates of Washington, D.C. to perform an evaluation of these programs on behalf of the Community Education Advisory Council.

Printing	3,207

(14,909 was allotted for printing in Fiscal)
(Year 1977. To date, $3,207 of this amount)
(was spent for printing. The remaining)
(funds will be used for printing the)
("Special Projects".)

Travel	$	988
(Aside from travel expenses incurred for Council meetings, travel funds were expended for the Chairman of the Council to attend two meetings in Washington, D.C. with other Office of Education Councils for the purpose of promoting cooperation and an interelationship among the Council. Two more visits were made to Washington, D.C. during Fiscal Year 1977; (1) one by the Chairman to testify before the Subcommittee on Elementary, Secondary and Vocational Education; and 2), in the absence of the Council Chairman, Mrs. Kimmel, member of the Council, appeared before the special Hearings held by the U.S. Office of Education.)		
Equipment	$	523
(One Sony Taperecorder was purchased and is used for the purpose of recording Council meetings in lieu of recording service.)		

Also a Caramat II slide/tape projector was purchased and will be used to give presentations on the Council at exhibits during meetings held out of the Washington, D.C. area.

NUMBER OF, AND EXPENDITURES FOR, PERSONNEL

In Fiscal Year 1976 a total of 1.4 person years were used in support staff for the Community Education Advisory Council. Follows is a breakdown of the person years used and expenditures incurred by the support staff.

Salary

75 percent - GS-7 Program Assistant ($10,946)
38 percent - GS-5 Secretary ($3,535)
13 percent - GS-14 OE Delegate ($3,858) = $18,339

Travel

OE delegate to the Council attended three out of town Council meetings at an average of $400.00 per meeting = 1,200

Payroll

Three travel checks for meetings attended by OE Delegate at $1.87 per check = 5.61

Taxi

Four round trip taxi fares to Federal Register to deliver announcement of Council meetings at $2.50 each. = 10

TOTAL EXPENDITURES FOR STAFF SUPPORT FOR FISCAL YEAR 1976 $19,555.61

NUMBER OF, AND EXPENDITURES FOR, PERSONNEL (continued)

In the Transition Quarter the person years used to provide support staff to the Advisory Council remained the same as in Fiscal Year 1976. Expenditures are shown for one-quarter of a year.

Salary

(Same as Fiscal Year 1976 - one-quarter of salaries are shown) = $4,584

Travel

During the transition quarter, the Council held two meetings out of town, which the OE delegate attended at an average cost of $400.00 per meeting. = 800

Payroll

Two travel checks for meetings attended by the OE delegate at $1.87 per check. = 3.74

Taxi

Two round trip taxi fares to the Federal Register to deliver announcement of the Council meetings at $2.50. = 5

TOTAL EXPENDITURES FOR STAFF SUPPORT FOR THE TRANSITION QUARTER $5,392.74

NUMBER OF, AND EXPENDITURES FOR, PERSONNEL (continued)

In Fiscal Year 1977 the person years used to provide support staff to the Advisory Council remained the same as in Fiscal Year 1976, at 1.4.

Salary

(Same as Fiscal Year 1976) = $18,339

Travel

OE delegate to the Council attended three out of town Council meetings at an average of $400.00 per meeting = 1,200

Payroll

Three travel checks for meetings attended by OE delegate at $1.87 per check. = 5.61

Taxi

A total of 5 Council meetings were held to date in Fiscal Year 1977 - Five round trip taxi fares to Federal Register to deliver announcement of Council meetings at $2.50 each. = 12.50

TOTAL EXPENDITURES FOR STAFF SUPPORT FOR FISCAL YEAR 1977 $19,557.11

Accomplishments of the Council

The Community Education Advisory Council has played an important and ongoing role in the development of the community education program at the Federal level. Calendar year 1975 was filled with major responsibilities for the Advisory Council. The Council has provided invaluable guidance in the development of program policy. As calendar year 1975 was the first year of activity under the Community Schools Act, major decisions on policy and administrative matters had to be made by the Commissioner and other U.S. Office of Education officials. The expertise of the Advisory Council and its individual members proved to be essential.

As the Community Schools Act represented the first direct categorical aid for community education, a regulation relating to its governance had to be developed. There existed among professional community educators throughout the country interest in its development and content. Advisory Council members played an invaluable role in considering the various opinions and interests of practitioners and making recommendations concerning them to U.S. Office of Education officials. Additionally, this input was invaluable to individual members as they prepared their own expertise in community education.

During the public comment period, after the publication of proposed regulations, over 200 separate written comments were received, in addition to the public comments on the regulation, made at the various meetings of the Advisory Council. Approximately 60 individuals, representing the State Departments of Education, local school districts, Tribal Councils, Neighborhood Advisory Councils, Universities, community colleges, the National Recreation and Parks Association, the National Community Education Association, and the Regional Centers for Community Education, addressed the Advisory Council during their meetings giving their reactions to the proposed regulation. Numerous persons have attended the Advisory Council meetings. During discussion of the proposed regulations, there were 160 individuals in attendance at one meeting. Based upon the input which the Council received as detailed above, and their own deliberations, the Council developed numerous recommendations concerning the regulations. Many of their recommendations were accepted by the Commissioner and incorporated into the final regulations.

On December 12, 1975, the final regulations governing the Community Schools Act were published in the Federal Register, making this the first program under the Special Projects Act to publish their finalized regulations.

The Community Education Advisory Council has been responsive in seeking input frequently from the general public as well as representatives of the field of community education. It has met in every section of the country to allow citizens who would not otherwise have the opportunity, the chance to make direct input to the Council regarding their concerns and attitudes. Clearly the Council provides individuals a forum for their input that could not be gained in any other manner. The ordinary citizen many times is less reluctant to approach a Council member who represents his or her area of interest and expertise.

When the Council holds meetings outside of the Washington, D.C. area, the meeting is structured to allow for hearings on specific topics of areas of concern to the Council and the Commissioner of Education. The topics of the hearings are well known to the public before the meeting, allowing the public sufficient time to prepare meaningful reports and recommendations. Listed below are meetings held by the Council in Calendar Year 1976, hearing topics, and organizations represented.

Date and Place	Hearing Topics	Organizations Represented
June 18, 19, 1976 Tuskegee Institute	Impact of Rural America in Comm. Education	Tuskegee Institute Alabama State Department of Education
	Developing Rural Models for Comm. Education	Alabama Adult and Community Education Association
	Assessing the Needs of Rural America	Northeast Community Education Development Center, Storrs, CT
	Interagency Coop. in Rural America	National Community Education Association
July 22, 23, 24, 1976 Seattle, Washington	Role of State Ed. Agency in Comm. Education	Citizens Groups Northwest Regional Laboratory University of Oregon Washington State Dept. of Education

Date and Place	Hearing Topics	Sampling of Organizations Represented
	Role of military in community education	U.S. Army State Supt. of Instruction Regional Commissioner of Education Clark County Parks and Recreation, Vancouver Alaska State Department of Education Clackamas Community College Washington State Board for Community College Education
September 17, 18, 1976 Washington, D.C.	Role of centers for community education	Northeast Community Education Development Center Teacher Corps, Howard University
	Cooperative Agreements	Maryland Community Education Association National Recreation and Park Association Coalition of Adult Education Associations Division of Adult Education, U.S. Office of Education Office of the General Counsel, U.S. Department of Health, Education and Welfare Administration on Aging Informatics, Inc. Gallaudet College Nevada State Board of Education
October 19, 20, 1976 Boston, Mass.	Recreation comm. education models	National Recreation and Park Association
	Role of Parks and Recreation Depts. in comm. ed.	National Community Education Association Northeast Center for Community Education - Storrs, Conn.

Date and Place	Hearing Topics	Organizations Represented
	Role of a National organization in a professional organization Developing a Consortium for Higher Education	Conn. State Dept. of Education Comm. Ed. Dev. Center - Rhode Island Neighborhood Resource Center Program - Lynn, Massachusetts Center for Community Education, University of Vermont Mass. State Board of Education Indiana University Council of State Presidents of . Recreation and Parks Associations Southeastern California Park and Recreation District Board of Directors Steering Committee, National Recreation and Parks Association Community Education Center, University of Maryland Cambridge Community Schools, Cambridge, Massachusetts
December 1, 2, 1976 Miami, Florida	Role of Foundations in Comm. Education International Comm. Education	National Community Education Association Massachusetts Community Education Association National School Volunteers Program Partners of the Americas Southeastern Regional Center for Community Education Dade County Community Education Association Texas A&M University Miami-Dade Community College Rocky Mountain Regional Center for Community Education South Carolina Center for Community Education Indiana Communuty Education Council Indiana State Dept. of Public Instr.

During Calendar Year 1977 the Council has held, to date three meetings. The dates, location and topics are provided below:

Date and Place	Topics
March 24, 25, 1977 San Diego, California	Status of Comm. Education Development in California Improving Community Participation in Community Education
May 24, 25, 1977 Washington, D.C.	Hearings on Future Legislative Recommendations
July 25, 26, 1977 Washington, D.C.	Evaluation of Federal Community Education Program Federal Community Education Clearinghouse

As mentioned earlier, the Council has undertaken a series of special studies. The Federal Community Education Program is a new program, and it has, therefore, become evident to the Council that there is a great need for the development of material on various facets of community education. Considerable time has been spent by the Council exploring areas and components of community education which require further study and/or development. A number of priorities have been established and 13 projects were funded. It is felt that these studies and reports will be a major contribution to the field of community education and will be of assistance to the Council as it prepares policy recommendations for the Commissioner of Education. These 13 studies and reports have been dubbed "Special Projects" by the Council, and are included as Attachment A.

Another important accomplishment of the Council has been its involvement in the evaluation of the Federal Community Education Program. The Council has worked closely with the U.S. Office of Education, Office of Planning, Budgeting, and Evaluation to develop the evaluation design and select a contractor to conduct the study.

Regarding the design of the evaluation study, the Council recommended that the thrust of this study be a description of the organization and operation of the projects funded in the three categories (local educational agencies, State educational agencies, and the institutes of higher education); to evaluate the impact of these projects at the local and State level; and an evaluation of the cost effectiveness of these projects.

The Council has provided invaluable advice on administrative and policy matters to the Community Education Program staff and to the U.S. Commissioner of Education. The future holds many challenges. It is anticipated that the Council will continue to be involved in promoting cooperative agreements, developing strategies and approaches for implementing these agreements. The Council is interested in investigating the potential of community education as a deterrant to juvenile delinquency, and is looking forward to making recommendations to establish a working relationship with the National Advisory Committee for Juvenile Justice and Delinquency Prevention. Also, the Council is much interested in making recommendations to establish a working relationship with the Lifelong Learning Program and the Teacher Corps. It is anticipated that the Council will develop a formal working relationship with the National Council of State Educational Agency Community Educators.

The Council will work towards establishing a relationship between Philanthropic foundations interested in community education and the U.S. Office of Education. The Council and the staff of the Community Education Program will plan to co-sponsor a seminar including representatives of major foundations and the Advisory Council. This seminar will focus on ways that the two groups can work together to facilitate community education development.

And, Mr. Chairman, in conclusion I would like to comment that I believe the Secretarially appointed councils are more cost effective and efficient than other types of councils in that:

1) They do not have their own full-time employees but utilize existing Office of Education personnel.

2) The Office of Education delegate to the Council is also the manager of the Program within the Agency. The advantage to this type of administrative arrangement is that the advice and recommendations of the Council have direct and systematic input into the operation of the program and to those officials directly responsible for administering the Federal program.

Thank you, Mr. Chairman. I will be happy to answer any questions you might have.

ATTACHMENT A

SUMMARY OF PROJECTS
UNDERTAKEN BY THE
COMMUNITY EDUCATION ADVISORY COUNCIL

Subject Area — Organization

1. Administrators Role in Community Education — American Association of School Administrators

The purpose of this project will be to produce a monograph of approximately 80 pages on the Role of Administors in Community Education. The monograph will be developed by a consultant/author that is jointly approved by AASA and the U.S. Office of Education. Results of the study will be reported to the leadership in a manner that is approved both by the U.S. Office of Education and AASA.

$6,991.00

2. Aging and Community Education — National Council on Aging

The purpose of the project will be to develop a Handbook on Aging/Community Education for distribution to the aging and community education networks. A major thrust of the handbook will be an examination of several exemplary community education models that involve the elderly both as a consumer and a contributor to the community. The findings of the study will be presented, through an appropriate forum, at the Annual Convention of the National Council on Aging to be held in Washington, D.C. in April 1977.

$9,990.00

3. Catalog of Federal Programs — University of Michigan Community Education Research Center

The purpose of the project will be to develop a catalog of Federal Programs that are related to community education. The catalog will include information about:

a. Primary Resources - Those where funds are immediately available.

b. Secondary Resources - Those where funds are not currently available but where funds may become available.

c. An examination of existing policy statements supporting community education that already exist within governmental units and related organizations.

$9,511.00

4. Community College Models	American Association of Community and Junior Colleges

A handbook will be developed that will detail several models for community education involving community colleges and local public school districts.

$5,045.00

5. Community Education and the Hearing Impaired	Gallaudet College

Two manuals will be developed that will present alternative models for bringing the hearing community and the deaf community closer together through the vehicle of community education. One publication will detail techniques that can be utilized to develop closer working relationships between state community education and hearing impaired leaders. The second publication will focus on means and techniques for involving state schools for the deaf in community education programs.

$9,500.00

6. Community Participation	Northwest Regional Laboratory

A handbook, approximately 80 pages in length will be developed that will provide a thorough analysis of community participation as well as alternative approaches for achieving meaningful community involvement. Descriptive information will be provided on at least two rural, suburban and urban approaches. The Northwest Laboratory will also be responsible for designing a system for dissemination of the results of the study on a variety of audiences.

$9,929.00

Subject Area	Organization
7. Cooperation, Consultation and Cooperative Agreements	National Community Education Association

The purpose of the project is to prepare a publication that includes a process for developing agency relationships, a listing of typical agencies that are found within communities, four models or samples of cooperative agreements and a delineated process for developing a cooperative agreement.

$9,674.00

8. Future of Community Education	Hudson Institute

The purpose of this project is to develop a paper which will deal with the ten-year future of elementary and secondary education in the context of community education. The product will be a "think piece" which will be made available to community education leaders and scholars who will figure prominently in the leadership of community education in the decade ahead.

$9,150.00

9. Life-Long Learning and Community Education	Coalition of Adult Education Organization

The purpose of the study will be to study the relationship between life-long learning and community education. Among the questions and issues that will be probed and analyzed are the following:

1. What are the similarities, as well as the differences, between the two movements and philosophies?

2. What roles should community educators play in life-long learning programs?

3. Are there exemplary programs in existance that illustrate close working relationships between the two programs?

A panel of distinguished adult and community education leaders will be utilized to analyze the above mentioned issues. Hopefully, the recommendations offered by the above mentioned groups will lead to future cooperative efforts between adult and community educators.

$9,805.00

Subject Area	Organization
10. Recreation Models	National Recreation and Park Association

The overall purpose of this project is to develop and/or identify effective models and case studies between parks and recreation and community education that can be utilized in a variety of settings. A project review committee will meet to assist in the selection of field sites, development of data and finalization of effective models.

$9,650.00

11. Role of State Education Agency in Community Education	Council of Chief State School Officers

The Council of Chief State School Officers will help to determine the appropriate future community education roles for state departments of education by:

1. Assessing perceptions of the Chief State School Officers about existing roles.
2. Defining appropriate future state roles.
3. Recommending methods for implementing the appropriate state roles.

$9,847.00

12. Statements on Community Education	Eastern Michigan University Center for Community Education

The project will research the history of community education by analysis of literature and by interviewing leaders in community education. Based upon the information obtained, an acceptable contemporary perspective statement will be composed which will delineate community education: whence it came, where it is now, and where it is going. Secondly, against the backdrop of this contemporary perspective, the project will display statements from a large number of prominent American leaders supporting the community education concept.

$9,978.00

Subject Area	Organization
13. Teacher Training and Community Education	American Association of Colleges and Teacher Education

The major purpose of the proposed project is to delineate approaches to infusing community school concepts into pre-service teacher training programs and to develop dissemination materials. One method of disseminating the results of the study will be to utilize a forthcoming issue of the Journal of Teacher Education. A major component of the issue will be devoted to the concept and practice of community schools, particularly the promotion of education personnel for them.

$9,975.00

Mr. ESSEX. The Chairman is familiar with community education, probably with more depth of background than anybody in the room. I think that would be putting too much on you this morning, to give you the entire treatment, but it is for the record and let me make just two or three casual observations if I may.

I know Birmingham also has a lively movement. I am not too familiar with South Dakota, but we are hopeful, and as we move toward the Indian community education concept, I am sure South Dakota will want to be aboard.

The issues have been very well stated by my predecessors, even to the educational presentation of the community education people. Hence there is a great deal going on and community education per se epitomizes the citizenship involvement, the ideals we are trying to restore in America. I suppose it should not go unmentioned that the absence of the opening of the school has been a matter of criticism nationwide for many years. Community education opens weekends, Saturdays, summers, and, in addition, it serves effectively as a catalyst in bringing all the forces together to serve.

We live in the most anonymous period in history, the loneliest generation in all history. Urbanization, mobility, other factors as well. Hence community education comes at a time when the nation needs very badly a restoration, a renaissance, a neighborliness of acquaintance, restoration of family, because it has been broken asunder too because the youngsters in the family no longer participate in the economic aspects of the family.

They become an economic liability for the first time in history and this is very discomforting to them. Community education can solve many of these problems. It has very tender roots I would like to remind you. It was enacted in 1974. It has moved beautifully. The regulations got in ahead of schedule and we are now well along with the evaluation process.

The first report is October-November, the next by the end of the year. We have the measuring instruments in place. We also have a clearinghouse in place, recognizing that this is, although not an entirely new movement, it is relatively unknown throughout the country.

The clearinghouse has an 800 number where people can get information. We are also well along with—well, we established it early. The procedures for assessing the needs of a community, a document for that purpose, and then the special projects as we term them within the special projects. We want to build up a base of knowledge so we have some 12 papers commissioned coming in each from a position of knowledge. Hence we will build up not just a library but a base of knowledge from which to work.

As I look at this group, how effectively they have functioned, it has been a complete success story. Frankly a bargain for the congress to get persons throughout the country to come in and give of their time as they generously have. Our hearings go as high as 160 persons appearing, many of whom want to be heard and we have heard them. When we schedule a meeting in the Pacific Northwest, it may relate to the State Department of Education specific purposes. Alaska came in with an outstanding report. Elsewhere the same has taken place. When we went to Tuskegee, it was rural community education, as you could well see, and had a specific purpose.

We are traveling the circuit; we are listening. We are concerned about family. We are concerned about vandalism. When the schools are open and functioning, vandalism tends to disappear. Senator Bayh's studies indicate that clearly.

In closing I would say it is a bargain. Only 1.4 of a percent give of their time in the office to manage the affairs. The council itself has been very productive. So at $150,000, I don't know where we could buy anything as effective to place the participation of citizens in an appropriate position to remove the loneliness.

Man indigenously is gregarious and even though that truck driver with the big semi behind him has all the conveniences, air-conditioning, power steering, power brakes, the CB to watch for Smokey and all the rest, he is a very lonely person in our anonymous society.

Community education is the answer to this as we see it, and it is beginning to function.

I shall cease at this point and await questions. Thank you.

Mr. **Kildee**. Thank you very much.

Community education has always had a certain missionary zeal and you certainly show that this morning.

I have been fortunate inasmuch as I was born and still live in Flint, Michigan, which is the Rome, the Jerusalem, the mecca of community education.

Thank you very much, Mr. Essex.

Our next member of the panel is Ms. Victoria Mongiardo, representing Mr. Frank Femminella, Chairperson, National Advisory Council on Ethnic Heritage Studies.

STATEMENT OF VICTORIA MONGIARDO

Ms. **Mongiardo**. My name is Victoria Mongiardo. I speak to you today representing Dr. Francis X. Femminella, Chairperson of the

National Advisory Council on Ethnic Heritage Studies. Due to a previous commitment and conflicting flight schedules, Dr. Femminella is regretfully unable to appear today. I will provide a copy of his statement for the record.

[The statement of Dr. Francis Femminella follows:]

TESTIMONY OF FRANCIS X. FEMMINELLA, CHAIRMAN, NATIONAL ADVISORY
COUNCIL ON ETHNIC HERITAGE STUDIES TO THE SUBCOMMITTEE ON ELEMENTARY,
SECONDARY, AND VOCATIONAL EDUCATION
THURSDAY, AUGUST 4, 1977

Duties and Responsibilities of the Council

The Council advises the Office of Education in its administration of Title IX of the Elementary and Secondary Education Act of 1965 in order to provide assistance designed to afford students the opportunity to learn about their own cultural heritage and the contributions of the other ethnic groups of the Nation.

The Council advises concerning matters of general policy arising from the administration of programs authorized by Title IX of the Elementary and Secondary Education Act of 1965, as added, and performs specific functions as follows:

1. Makes recommendations to the Commissioner, the Assistant Secretary, and the Secretary regarding the collection of data to facilitate program planning and evaluation; e.g., recommend a survey of needs to determine or modify program priorities, or suggest national or regional reviews of intercultural curriculum and personnel development.

2. Suggests innovations or program changes as the program evolves and develops toward improving ethnic heritage Studies.

3. Suggests promising areas of inquiry to give direction to research; e.g., recommend ethnographic studies as required for substantial intercultural curriculum materials development.

4. Provides such administrative and legislative proposals as may be appropriate.

Budget for FY1978

4 meetings of the full National Advisory Council	$ 29,800
2 meetings in Washington, D.C. @ $7,100 per meeting	
2 meetings outside Washington, D.C. @ $7,800 per meeting	
Cost of 15 site visits for members of NAC	6,450
Cost of printing Annual Report (500 copies)	1,000
2 subcommittee meetings in Washington, D.C. (6 members)	3,900
Supplies	200
TOTAL	$ 41,350

Name of Council Member	1975-1976 No. of Meetings	(Honorariums included in Cost) Cost Incurred	1976-1977 No. of Meetings	Cost Incurred
Andersen, A. L.	3	$ 920.88	0	
Arndt, K. J. R.	6	2,278.00	3	$1,239.00
Banks, J. A.	2	1,249.00	1	739.00
Bilirakis, E. M.	4	1,383.00	3	1,559.00
Carson, C. N.	4	1,548,00	3	1,467.00
Delgado, M. C.	0		2	894.00
Femminella, F. X.	7	2,501.00	3	1,247.00
Mahoney, K. O.	1	354.00	0	
Mazewski, A. A.	4	1,162.00	0	
Medicine, B.	5	3,074.00	3	1,530.00
Novak, M.	0		3	1,179.00
Pap, M.	5	1,768.00	3	1,404.00
Perk, R.	2	161.00	0	
Pleer, I.	0		2	689.00
Provencio, J. R.	4	1,985.00	0	
Stein, M. F.	4	1,218.00	3	881.00
Tsu, J. B.	7	2,030.00	3	1,135.00
Ware, M. J.	6	3,268.00	0	
		$24,899.88		$14,053.00

The plan is for four meetings per year, with cost estimated as follows:

Consultant Services--Cost of stipend for 15 members $100 per day for 2 days	$3,000
Travel--Cost of air fare and other transportation costs	2,600
Travel--Cost of per diem and other expenses	1,500
	$7,100

Accomplishments of the Council

Since the appointment of the Council members in 1975, the Council has recommended priorities for the program, monitored the selection procedures, made on-site inspections, and developed broader publicity for the program. Through standing and ad hoc subcommittees it has been successful in providing national leadership in the area of ethnic affairs, and through public hearings conducted in several cities has listened and heard the voices of representatives of some 50 million citizens. The Council has established working committees on program goals, on liaison with related councils, the Congress and the public.

Few issues are more important in our society than ethnic and racial harmony. Such harmony will not come out of ignorance or fear, but out of accurate knowledge. The "cultural amnesia" of many of our citizens about their own roots and those of others is a dangerous threat to intelligent civil life. In these times of economic restraints, only the most important and effective programs should be continued. We are impressed with the possibilities of this program for enhancing the unity of our Nation. In view of this, we believe that the Ethnic Heritage Studies Program merits continuation, and we hope that we can count on the full support of the Administration as well as of the Congress.

ANNUAL REPORT NATIONAL ADVISORY COUNCIL ON ETHNIC HERITAGE STUDIES, 1976

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

June 7, 1977

Honorable Walter F. Mondale
President of the Senate
Washington, D.C.

Dear Mr. President:

On behalf of the National Advisory Council on Ethnic Heritage Studies, I am happy to submit to you our Annual Report for the period 1976-77.

The Council continued its work of advising the Office of Education in its administration of Title IX of the Elementary and Secondary Education Act. Since our appointment we have recommended priorities for the program, monitored the selection procedures, made on-site inspections, and developed broader publicity for this excellent program. Through standing and *ad hoc* subcommittees we have been successful in providing national leadership in the area of ethnic affairs, and through public hearings conducted in several cities, we have listened and heard the voices of representatives of some 50 million citizens. All of the major recommendations of our prior report were accepted by the Commissioner, by the Under Secretary and by the Deputy Director of the Office of Management and Budget.

The members of the staff of the Division of International Education and the Ethnic Heritage Studies Branch have been of assistance to us. Few issues are more important in our society than ethnic and racial harmony. Such harmony will not come out of ignorance or fear, but out of accurate knowledge. The "cultural amnesia" of many of our citizens about their own roots and those of others is a dangerous threat to intelligent civil life. We believe the appropriation of funds for this bill--$1.8 million in FY 1977--is grossly inadequate for the magnitude of the task. (The original Congressional authorization was $15 million annually.)

In these times of economic restraints we are impressed with the possibilities of this program for enhancing the unity of the Nation. We believe that the Ethnic Heritage Studies program merits, and we hope we can count on, the continued full support of the Administration and the Congress.

Sincerely yours,

Francis X. Femminella, Ph.D.
Chairman, National Advisory Council
on Ethnic Heritage Studies

Enclosure

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

June 7, 1977

Honorable Thomas P. O'Neill, Jr.
Speaker of the House of
Representatives
Washington, D.C.

Dear Mr. Speaker:

On behalf of the National Advisory Council on Ethnic Heritage Studies, I am happy to submit to you our Annual Report for the period 1976-77.

The Council continued its work of advising the Office of Education in its administration of Title IX of the Elementary and Secondary Education Act. Since our appointment we have recommended priorities for the program, monitored the selection procedures, made on-site inspections, and developed broader publicity for this excellent program. Through standing and ad hoc subcommittees we have been successful in providing national leadership in the area of ethnic affairs, and through public hearings conducted in several cities, we have listened and heard the voices of representatives of some 50 million citizens. All of the major recommendations of our prior report were accepted by the Commissioner, by the Under Secretary and by the Deputy Director of the Office of Management and Budget.

The members of the staff of the Division of International Education and the Ethnic Heritage Studies Branch have been of assistance to us. Few issues are more important in our society than ethnic and racial harmony. Such harmony will not come out of ignorance or fear, but out of accurate knowledge. The "cultural amnesia" of many of our citizens about their own roots and those of others is a dangerous threat to intelligent civil life. We believe the appropriation of funds for this bill--$1.8 million in FY 1977--is grossly inadequate for the magnitude of the task. (The original Congressional authorization was $15 million annually.)

In these times of economic restraints we are impressed with the possibilities of this program for enhancing the unity of the Nation. We believe that the Ethnic Heritage Studies program merits, and we hope we can count on, the continued full support of the Administration and the Congress.

Sincerely yours,

Francis X. Femminella, Ph.D.
Chairman, National Advisory Council
on Ethnic Heritage Studies

Enclosure

SECOND ANNUAL REPORT ON THE NATIONAL ADVISORY COUNCIL ON ETHNIC HERITAGE STUDIES OF THE OFFICE OF EDUCATION

The National Advisory Council on Ethnic Heritage Studies was established under the authority of Section 906(a) of the Elementary and Secondary Education Act (ESEA) of 1965, as added by Section 504(a) of the Education Amendments of 1972, Pub. L. 92-318 (20 U.S.C. 900a-4). It has been authorized to advise the Secretary, the Assistant Secretary for Education, and the Commissioner of Education on the implementation of Title IX of the ESEA, as amended, in order to provide assistance designed to afford students the opportunity to learn more about their own cultural heritage and the contributions of the other ethnic groups of the Nation. The Council is entrusted with matters of general policy, as well as specific functions.

I. ACTIVITIES OF THE COUNCIL

During the period covered by this annual report, the National Advisory Council on Ethnic Heritage Studies met three times:

February 5-6, 1976 -- Cleveland, Ohio

Dr. Myron Kuropas, Special Assistant to the President on Ethnic Affairs, attended this meeting to observe the Advisory Council functions and to assess various viewpoints on ethnic studies in the United States. A review of projects proposed to the Office of Education for funding, as well as those the Office of Education is currently supporting, revealed that the degree of interest in ethnic studies has remained at a constant level over the years.

May 17-18, 1976 -- Washington, D.C.

The Council's meeting in May centered around new priorities for the Ethnic Heritage Studies program. It was recommended that future emphasis should be given to the training of teachers in the use of curriculum materials.

On May 18, the National Advisory Council attended the White House Conference on Ethnicity and Education, which it jointly sponsored with the White House Office of Public Liaison and the National Ethnic Studies Assembly. The purpose of the meeting was to discuss the future direction of ethnic heritage studies in the United States and the role of the Federal Government in helping to define that direction.

The meeting was attended by 77 ethnic leaders and academicians representing 21 separate ethnic groups. Dr. John Tsu, Dr. Michael Pap, and Dr. Francis Femminella, all members of the National Advisory Council, presented position papers to the conference.

Underscoring the Ford Administration's support for ethnic heritage studies during the course of the one-day meeting were John O. Marsh, Jr., Counsellor to the President, Paul H. O'Neill, Deputy Director, Office of Management and Budget, Dr. Myron B. Kuropas, Special Assistant to the President for Ethnic Affairs, Mrs. Marjorie Lynch, Undersecretary, Department of Health, Education and Welfare, Harold L. Hodgkinson, Director, The National Institute of Education, and Robert P. Hanrahan, Deputy Assistant Secretary for Education. Senator Richard Schweiker (Pennsylvania), an author of the Ethnic Heritage Studies Bill, also spoke at the conference.

July 15-16, 1976 -- Detroit, Michigan

The Council met in Detroit at the invitation of its Mayor, The Honorable Ralph Park, in observance of the city's unique ethnic heritage program as part of its Bicentennial celebration. As with all its meetings, public participation/testimony was encouraged by the Council. Representatives from the public sector who appeared before the Council in Detroit were:

1) Peter Vicko.............Czeckoslovak National Council of America
2) Michael Grishkoff.......Congress of Russian Americans, Inc.
3) Lubomyr R. Wynar........Center for Study of Ethnic Publications,Kent, Ohio
4) Josie White Eagle.......Indian Education Office, Pierre, South Dakota
5) Luella Baron............Italian Study Group of Troy, Michigan
6) Edward Plocha...........National Center for Urban Ethnic Affairs
7) Armen Ovhanesian........Alex Manoogian School
8) Peter Stasiw............Immaculate Conception Ukranian High School
9) Bernard Schwartz........Illinois Council on Ethnicity in Education
Vice-President, NESA
10) Alexander W. Amurkiewicz..Polish Scouting Organization
11) Paul Barker.............American Jewish Committee
12) Gregory Biestek.........Polish American Congress
13) Father Dan Bogus........Transfiguration Church, Detroit, Michigan
14) Charmain Riesgari.......International Institute of Greater Toledo
15) Arthur "Butch" Elliott..Detroit American Indian Center
16) Hank Bonga..............Detroit American Indian Center
17) Roma Dyhdalo............Ukranian National Women's League of America
18) Blandyne J. Ehrenhoeutz.Multi-Ethnic Curriculum Department, Bach School
19) Malvina Hauk-Abonyi.....Ethnic Studies Division, Wayne State University
Detroit, Michigan
20) Anna Jeromsky...........Russian American Congress, Detroit, Michigan
21) Edward V. Kolyszko......Former Project Director, University of Illinois
at Chicago Circle
22) John Cadzow.............Ethnic Heritage Program, Kent, Ohio

Newspaper and television media coverage of the meetings included an appearance by Vice Chairman Francis X. Femminella on a local T.V. program.

II. COUNCIL RECOMMENDATIONS FOR THE 1978 PROGRAM

1. To support the use of regional clearinghouses for information evaluation, dissemination, documentation, and references providing teachers, scholars, students, ethnic community leaders, and other individuals an opportunity to utilize existing materials in promoting and implementing ethnic studies programs.

2. To fund workshops designed to offer comprehensive training programs for ethnic community leaders; to develop organizational capabilities; to operate cultural programs; to stimulate multiethnic cooperation; to engage in a systematic and meaningful dialogue; to create an atmosphere of trust contributing to improvements, viability, and stability of neighborhoods; and to remove artificial barriers based on ignorance and fear.
3. To fund periodic public conferences for teachers, students, and the general public, with prominent specialists as lecturers, on the status and development of ethnicity as a unifying factor in America. The proceedings of such conferences, including extensive bibliographies, should be published and widely disseminated through the regional clearing houses.
4. To continue support projects on the indigent ethnic groups in the United States.
5. To fund projects aimed at the systematic review of textbooks treating ethnicity in the schools and to develop improved materials as needed.
6. To research the selection process of readers and evaluators of ethnic studies projects submitted to the Office of Education for funding under Title IX. Not only should readers be objective and knowledgeable about the multiethnic character of our society, but they should be recognized by multiethnic community organizations.
7. To fund a comprehensive study of the Ethnic Studies Program and its impact on the educational system of the United States on the basis of criteria to be developed later by its National Advisory Council.

III. REVIEW OF ETHNIC HERITAGE STUDIES PROGRAM ACTIVITIES - FY 1976

Appropriation: In fiscal year 1976, the total amount appropriated for Title IX, ESEA, was $1,800,000. This was less than the previous year's $2,355,000.

Applications: The criteria of eligibility and selection, based on the Act, were published in both the Federal Register and the Guidelines for Application.

In 1976 over 7,000 copies of the Guidelines for Application were mailed to ethnic associations, school districts, State departments of public instruction, postsecondary institutions, and, on request, to interested individuals.

In 1976, the Office of Education received 570 applications and made 49 project grants--8.7 percent of the applications submitted. The maximum grant for any project did not exceed $50,000, with the average grant award being $37,000. The total amount of support requested by eligible proposals was over $25 million. The actual appropriation represented 7 percent of this amount.

During 1976, proposals were received from every State as well as from the District of Columbia, Guam, Puerto Rico, American Samoa, and the Trust Territories. Proposals were submitted from urban, suburban, and rural areas and included metropolitan, regional, statewide and national projects.

Most applications proposed multiethnic projects and were prepared as a result of cooperation between educational institutions and numerous ethnic groups. Ethnic community participation in the projects is required by Title IX, ESEA, and is accomplished by involvement of individuals and organizations of the ethnic group or groups with which a particular project is concerned.

Grants Review Process: A total of 49 Federal and field personnel participated in the technical review process in 1976. Each application was reviewed by a panel that included experts in ethnic studies, curriculum and personnel development, the social sciences and/or the humanities. On each panel, where possible, at least one member had an ethnic background related to the applications under consideration.

All efforts were made to prevent real and apparent conflict of interest. Reviewers were chosen from among those specialists who had not presented a proposal. Each application was evaluated and rated independently by three reviewers. Thereafter, the reviewers worked in panels to group or rank proposals recommended for funding.

IV. FUNCTION OF THE COUNCIL

The Council shall advise the Secretary, the Assistant Secretary for Education and the Commissioner of Education on the implementation of Title IX of the Elementary and Secondary Education Act of 1965 in order to provide assistance designed to afford students the opportunity to learn about their own cultural heritage and the contributions of the other ethnic groups of the Nation.

The Council shall advise concerning matters of general policy arising from the administration of programs authorized by Title IX of the Elementary and Secondary Education Act of 1965, as added, and shall perform specific functions as follows:

1. Make recommendations to the Commissioner, the Assistant Secretary, and the Secretary regarding the collection of data to facilitate program planning and evaluation; e.g., recommend a survey of needs to determine or modify program priorities, or suggest national or regional reviews of intercultural curriculum and personnel development.

2. Suggest innovations or program changes as the program evolves and develops toward improving ethnic heritage studies.

3. Suggest promising areas of inquiry to give direction to research; e.g., recommend ethnographic studies as required for substantial intercultural curriculum materials development.

4. Provide such administrative and legislative proposals as may be appropriate.

5. Not later than March 31 of each year, submit to the Congress a report of its activities, findings, and recommendations.

APPENDICES

MEMBERSHIP
NATIONAL ADVISORY COUNCIL ON ETHNIC HERITAGE STUDIES

Mr. Anthony L. Andersen
President
H. B. Fuller Company
2400 Kasota Avenue
St. Paul, Minnesota 55108
7/28/75 - 8/31/77

Dr. Karl J. R. Arndt
Professor of German
Clark University
Worcester, Massachusetts 01610
7/28/75 - 8/31/77

Dr. James A. Banks
1333 Northwest 200 Street
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7/28/75 - 8/31/78

Mrs. Evelyn M. Bilirakis
304 Driftwood Drive, West
Palm Harbor, Florida 33563
7/28/75 - 8/31/77

Mrs. Carmen N. Carson
7400 University Drive
St. Louis, Missouri 63130
7/28/75 - 8/31/78

Ms. Martha C. Delgado
426 - 2nd Street, #2
Ann Arbor, Michigan 48103
1/14/77 - 8/31/79

Dr. Francis X. Femminella (CHAIRMAN)
Professor, School of Education
State University of New York at Albany
Grandview Terrace (Home)
Selkirk, New York 12158
7/28/75 - 8/31/78

Mr. Alexander Haley
Author
1801 Avenue of the Stars
Suite 640
Los Angeles, California 90067
1/14/77 - 8/31/79

Dr. Beatrice Medicine
Department of Anthropology
University of Wisconsin, Madison
10 N. Broom, #1 (Home)
Madison, Wisconsin 53703
7/28/75 - 8/31/77

Mr. Michael Novak
Syndicated Columnist and
Professor of Religious Studies
Syracuse University
5 Snug Cove Lane (Home)
Bayville, New York 11709
1/14/77 - 8/31/79

Dr. Michael S. Pap
Director, Institute of Soviet and
East European Studies
John Carroll University
University Heights, Ohio 44118
7/28/75 - 8/31/77

Mayor Ralph Perk
Cleveland, Ohio 44114
7/28/75 - 8/31/78

Mr. Ilmar Pleer
Director
Johnston National Scouting Museum
Route 130
North Brunswick, New Jersey 08902
1/14/77 - 8/31/79

5/77

Membership
NAC on Ethnic Heritage Studies

Mrs. Mildred F. Stein
2500 Virginia Avenue N.W.
Apartment 603-S
Washington, D.C. 20037
1/14/77 - 8/31/79

Dr. John B. Tsu
Director
Institute of Far Eastern Studies
Seton Hall University
South Orange, New Jersey 07079
7/28/75 - 8/31/78

COUNCIL COMMITTEES

Inter-Council Committee

John B. Tsu, Chairman
Anthony L. Andersen
Francis X. Femminella

Annual Report Committee

Carmen N. Carson, Chairman
Karl J. R. Arndt
James A. Banks

Legislative Committee

Evelyn M. Bilirakis, Chairman
Ralph Perk
Ilmar Pleer

Public Liaison Committee

Mildred F. Stein, Chairman
Michael Novak
Martha C. Delgado

Program Committee

Michael S. Pap, Chairman
Beatrice Medicine
Alexander Haley

This presentation will cover statistics regarding the applications received by the Ethnic Heritage Studies Branch for the fiscal year projects 1976 - 1977.

The total number applications received was 562 from all 50 states, the District of Columbia, Guam, Puerto Rico, American Samoa, Pacific Trust Territories and the U.S. Virgin Islands.

Attached are exhibits of (a) the total amounts requested by state, (b) a listing of the number of applications received by the state and the dollar amount requested, and (c) the number and amounts received by the ten HEW Regions.

The total dollar amount requested for this year is a little over $24,000,000. and the amount appropriated is 2.3 million for the funding of approximately 50 maxi-grants and 30 mini-grants.

The proposals received are broken down by categories and they are as follows:

	TYPE	No. RECEIVED
1.	Institutions of Higher Education	213
2.	Jr. and Community Colleges	22
3.	Local Education Agencies (LEA'S) (school boards, city dept. of educ.etc.)	91
4.	State Departments of Education	15
5.	Ethnic Groups	75
6.	Ethnic and Community Groups	23
7.	Professional Education Associations	108
8.	Misc. (Museums, Archives, TV, Radio Stations, Libraries, Arts Academies)	15
		562

We have noticed an increase in the number of ethnic groups and those groups listed under miscellaneous.

ETHNIC HERITAGE STUDIES PROJECTS--1974-1976

STATE	1974	1975	1976	TOTAL PROJECTS	TOTAL ALLOCATION
ALABAMA	1	-	1	2	$ 70,000.
ALASKA	1	-	-	1	60,000.
ARIZONA	-	-	1	1	38,000.
ARKANSAS	-	-	-	-	-
CALIFORNIA	3	4	3	10	432,000.
COLORADO	1	1	1	3	118,000.
CONNECTICUT	1	1	2	4	195,500.
DELAWARE	-	1	-	1	40,000.
FLORIDA	1	-	1	2	78,000.
GEORGIA	-	1	1	2	76,000.
HAWAII	1	1	1	3	125,000.
IDAHO	-	1	-	1	37,000.
ILLINOIS	3	1	2	6	311,000.
INDIANA	1	-	1	2	72,000.
IOWA	1	1	1	3	102,000.
KANSAS	-	1	-	1	45,000.
KENTUCKY	-	-	1	1	39,000.
LOUISIANA	-	1	-	1	42,000.
MAINE	-	-	-	-	-
MARYLAND	-	1	3	4	114,000.
MASSACHUSETTS	3	3	1	7	280,000.
MICHIGAN	1	1	2	4	274,000.
MINNESOTA	2	1	1	4	165,000.
MISSISSIPPI	-	-	-	-	-
MISSOURI	1	-	-	1	50,000.
MONTANA	-	1	-	1	26,000.
NEBRASKA		1	-	1	31,000.
NEVADA	-	1	-	1	35,000.
NEW HAMPSHIRE	-	-	1	1	33,000.
NEW JERSEY	2	2	-	4	$197,000.
NEW MEXICO	1	1	2	4	118,000.
NEW YORK	5	4	7	16	665,000.
NORTH CAROLINA	-	2	-	2	82,000.
NORTH DAKOTA	-	-	1	1	38,000.
OHIO	1	1	1	3	251,000.
OKLAHOMA	-	-	1	1	40,000.
OREGON	1	1	1	3	104,000.
PENNSYLVANIA	3	2	2	7	272,000.
RHODE ISLAND	1	1	-	2	91,000.
SOUTH CAROLINA	1	-	1	2	68,000.
SOUTH DAKOTA	1	-	-	1	45,000.
TENNESSEE	-	-	-	-	-
TEXAS	1	2	1	4	168,000.
UTAH	-	1	-	1	38,000.
VERMONT	-	-	1	1	13,000.
VIRGINIA	1	1	1	3	131,500.
WASHINGTON	-	1	1	2	70,000.
WEST VIRGINIA	-	1	-	1	45,000.
WISCONSIN	1	1	1	3	118,000.
WYOMING	-	-	1	1	38,000.
AMERICAN SOMOA	-	-	-	-	
DISTRICT OF COLUMBIA	2	5	2	9	401,000.
GUAM	-	-	-	-	
PUERTO RICO	-	-	-	-	
TRUST TERRITORIES	-	-	1	1	39,000.
Totals	42	49	49	140	

TEXT OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, TITLE IX, AS AMENDED BY THE EDUCATION AMENDMENTS OF 1972 and 1974

Ethnic Heritage Studies Program

Sec. 504. (a) The Elementary and Secondary Education Act of 1965 is amended by adding at the end thereof the following new title:

"TITLE IX--ETHNIC HERITAGE PROGRAM

"Statement of Policy

"Sec. 901. In recognition of the heterogeneous composition of the Nation and of the fact that in a multiethnic society a greater understanding of the contributions of one's own heritage and those of one's fellow citizens can contribute to a more harmonious, patriotic, and committed populace, and in recognition of the principle that all persons in the educational institutions of the Nation should have an opportunity to learn about the differing and unique contributions to the national heritage made by each ethnic group, it is the purpose of this title to provide assistance designed to afford to students opportunities to learn about the nature of their own cultural heritage, and to study the contributions of the cultural heritages of the other ethnic groups of the Nation.

"ETHNIC HERITAGE STUDIES PROGRAMS

"Sec. 902. The Commissioner is authorized to make grants to, and contracts with, public and private nonprofit educational agencies, institutions, and organizations to assist them in planning, developing, establishing, and operating ethnic heritage studies programs, as provided in this title.

"Authorized Activities

"Sec. 903. Each program assisted under this Title shall --

"(1) develop curriculum materials for use in elementary or secondary schools, or institutions of higher education relating to the history, geography, society, economy, literature, art, music, drama, language, and general culture of the group or groups with which the program is concerned, and the contributions of that ethnic group or groups to the American heritage, or

"(2) disseminate curriculum materials to permit their use in elementary or secondary schools or institutions of higher education throughout the Nation; or

"(3) provide training for persons using, or preparing to use, curriculum materials developed under this title, and

"(4) cooperate with persons and organizations with a special interest in the ethnic group or groups with which the program is concerned to assist them in promoting, encouraging, developing, or producing programs or other activities which relate to the history, culture, or traditions of that ethnic group or groups.

"Applications

"Sec. 904. (a) Any public or private nonprofit agency, institution, or organization desiring assistance under this title shall make application therefor in accordance with the provisions of this title and other applicable law and with regulations of the Commissioner promulgated for the purposes of this title. The Commissioner shall approve an application under this title only if he determines that --

"(1) the program for which the application seeks assistance will be operated by the applicant and that the applicant will carry out such program in accordance with this title;

"(2) such program will involve the activities described in section 903; and

"(3) such program has been planned, and will be carried out, in consultation with an advisory council which is representative of the ethnic group or groups with which the program is concerned and which is appointed in a manner prescribed by regulation.

"(b) In approving applications under this title, the Commissioner shall insure that there is cooperation and coordination of efforts among the programs assisted under this title, including the exchange of materials and information and joint programs where appropriate.

"Administrative Provisions

"Sec. 905. (a) In carrying out this title, the Commissioner shall make arrangements which will utilize (1) the research facilities and personnel of institutions of higher education, (2) the special knowledge of ethnic groups in local communities and of foreign students pursuing their education in this country, (3) the expertise of teachers in elementary and secondary schools and institutions of higher education, and (4) the talents and experience of any other groups such as foundations, civic groups, and fraternal organizations which would further the goals of the programs.

"(b) Funds appropriated to carry out this title may be used to cover all or part of the cost of establishing and carrying out the programs, including the cost of research materials and resources, academic consultants, and the cost of training of staff for the purpose of carrying out the purposes of this title. Such funds may also be used to provide stipends (in such amounts as may be determined in accordance with regulations of the Commissioner) to individuals receiving training as part of such programs, including allowances for dependents.

"National Advisory Council

"Sec. 906. (a) There is hereby established a National Advisory Council on Ethnic Heritage Studies consisting of fifteen members appointed by the Secretary who shall be appointed, serve, and be compensated as provided in part D of the General Education Provisions Act.

Ms. MONGIARDO. I am the daughter of Italian immigrants. I grew up in Bay Ridge, Brooklyn, New York, Congressman Zeferetti's District. I am currently with the National Center for Urban Ethnic Affairs as Director of Ethnic Affairs.

The National Advisory Council on Ethnic Heritage Studies is a critical element of intercultural education in the U.S.

With that in mind, I would like to begin with some brief comments on the importance of the Title IX Ethnic Heritage Studies Act.

The programs included in Title IX Ethnic Heritage Studies Act must be preserved and expanded. Title IX lays the foundation for building inter-cultural education into the curriculum of our schools, with implications for neighborhoods, media and mental health. That inclusion is necessary and significant.

Today our world is marked with serious inter-cultural conflicts; between blacks and whites in South Africa, Arabs and Israelis in the Middle East, Catholics and Protestants in Northern Ireland, and many others. Our country too suffers from the alienation of inter-cultural conflict. The United States reflects the world's pluralistic nature in microcosm. The United States is a "nation of nations," for it is composed of representatives of every religious, ethnic and racial background.

The "melting pot" theory advocated in our schools in the past has not adequtaely addressed our unique heritage. An alternative educational model that promotes individual identity and inter-cultural understanding is essential if we are to truly understand and accept the pluralistic nature of the U.S.

The Title IX program is just beginning to demonstrate significant visible impact. All over the country, schools are requesting information and beginning to model successful ethnic heritage studies programs. The following are a few examples of those programs.

The State of Indiana, through Indiana University at South Bend, is using inter-cultural materials, including an Ethnic Resource Guide and publications on Afro-Americans, Hungarian-Americans, Polish-Americans, and Mexican-Americans of South Bend, in elementary and econdary curriculums. A suburban school district in California has developed a Curriculum Development Program in Suburban Ethnicity: A case of the Greek-American experience in Southern California. Cleveland, Ohio's public schools have designed a Cleveland Ethnic Heritage Studies Development Program and more general Ethnic Heritage Studies: multi-ethnic curriculum units. The Rhode Island Department of Education has prepared ethnic resource materials for teachers and an Italian reader for Italians in Rhode Island. Many more such programs exist and are constantly expanding.

If funds were to be lost under Title IX, we would lose the investment and momentum that has been gained even before the task and intent of Title IX legislation has been achieved.

The National Center for Urban Ethnic Affairs, an organization working with ethnic and racial groups in 55 cities in 27 states goes on record as supporting the continuation and expansion of Title IX Ethnic Heritage Studies Act programs.

The importance of the Ethnic Heritage Studies National Advisory Council lies in the significance of Title IX programs. The diverse nature of Title IX programs makes an advisory council that is ethnically, racially and regionally representative essential for maximum results and involvement. A broad based advisory council goes to the heart of President Carter's concept of citizen participation.

We are aware that advisory councils sometimes circumvent citizen participation through political patronage and pre-selection. However, this need not always be the case.

This Advisory Council performs roles of advocacy, outreach, and communiation for the bureaucracy and the public. Its composition affords the Advisory Council a spirit of creativity and multi-faceted body of knowledge that supplies a corrective for "the narrow perspective of the Washington point of view." In addition, it provides a system of checks and balances, oversees legislation and reviews materials.

The Advisory Council stimulates and encourages public comment and gathers citizen reaction which is reported to program managers at the Office of Education so that more effective program design and implementation can occur.

During its brief existence, the impact of the Advisory Council has been significant. Three Advisory Council members, Dr. Tsu, Director of Far East Institute, Seton Hall, New Jersey—nationally known figure in the area of Bilingual Education—Dr. Michael Pap, Director of Institute for Soviet Studies at John Carroll University, Cleveland, Ohio, and Dr. Francis X. Femminella, Professor of Sociology and Education, State University of New York at Albany, New York, made presentations at the White House Conference on Ethnicity and Education in May 1976. Alex Haley, another member of the Advisory Council, has further heightened ethnic awareness with his book "*Roots.*"

I might just add that I am unique in this panel in that I am not on any of the Advisory Committees, but am an advocate for them.

The most important support of the National Advisory Council comes from projects funded by Title IX. According to Jim Anderson, a researcher associated with the University of Michigan, who surveyed the 140 projects funded by Title IX and conducted interviews in communities with projects, there is overwhelming support for the National Advisory Council. Anderson's research identified the following reasons for tht support:

The National Advisory Council (1) provides more effective and far-reaching lines of communication; (2) includes varying ethnic and racial groups insuring representation of their concerns; (3) demonstrates that ethnicity and cultural diversity is an important part of the government's agenda.

Title IX Ethinic Heritage Studies Act has far-reaching implications for the population in this country. Over 60 million people are interested in ethnic conerns.

An active, qualified Advisory Council that is as representative and broad-based as possible is crucial to successful program implementation. The Advisory Council serves at a minimum expenditure while achieving maximum results.

The cost/benefit ratio is exceptionally high because it does affect representation of such a diverse audience with a minimal budget and expense needs.

The council members have not only provided leadership but have initiated volunteer involvement on a local and national level thereby multiplying their effectiveness throughout the country. Because they have representation and contacts over such a wide geographical and diverse area, the Advisory Committee is able to greatly amplify the scope and coverge of existing programs.

The National Advisory Council recommends the continuance of the National Advisory Council on Ethnic Heritage Studies. The National Center for Urban Ethnic Affairs, as an advocate for ethnic conerns, concurs in that recommendation.

In the event that reorganization of Advisory Councils takes place, it is absolutely mandatory that ethnic interests be addressed through a meaningful mechanism that insures the concern of this group who are presently not being served by any other structure. The presumption that duplication of programs exists through Inter-Education and Developing Institutions is erroneous. Large numbers of ethnic and racial groups are not included in such programs. It is also imperative that the Advisory Council and other interested ethnic groups participate in this decision. While we support mechanisms that exist to insure the concerns of various interest groups, women, handicapped, a mechanism that includes the interest and concerns of ethnics must also be provided.

In closing, I would like to make a personal observation. During the Carter Campaign I coordinated the Urban Ethnic Desk in Atlanta. I also worked on the Transition Team. It is my conviction that this Administration does not understand the implications of ethnicity and that sensitivity and knowledge on their part must be increased. Because of this, any programs or mechanisms that asisst in this effort must be encouraged and expanded.

Mr. KILDEE. Thank you very much, Ms. Mongiardo.

Our last member of the panel is very well known to this committee, Dr. Peter Relic, Deputy Assistant Secretary for Education, representing Dr. Mary Berry, Assistant Secretary for Education, presiding officer of the Advisory Council for Education Statistics.

STATEMENT OF DR. PETER D. RELIC

Dr. RELIC. Thank you, Mr. Chairman and Mr. Buchanan. We have presented written testimony to you and therefore I will take only a few minutes to summarize the main points in response to your very specific question.

[The prepared statement of Dr. Peter Relic follows:]

DR. PETER D. RELIC
TESTIMONY
of
DEPUTY ASSISTANT SECRETARY FOR EDUCATION
Before the
SUBCOMMITTEE ON ELEMENTARY, SECONDARY AND VOCATIONAL EDUCATION
COMMITTEE ON EDUCATION AND LABOR

Mr. Chairman and Members of the Subcommittee:

It is a pleasure to appear before you today to discuss the responsibilities and activities of the Advisory Council for Education Statistics. As you know, the Council was created in 1974 as part of Section 501 of the Education Amendments of 1974, which established the National Center for Education Statistics (NCES) within the Office of the Assistant Secretary for Education. The Council advises the Secretary of HEW and the Assistant Secretary for Education and reviews the general policies for the operation of NCES. It establishes standards to insure that statistics and analyses disseminated by the Center are objective and of high quality. The Council is required to submit, through the Secretary and the Assistant Secretary for Education, to the Congress an annual report of its membership, meetings, functions and a summary of its activities, findings and recommendations during the preceding year.

The Advisory Council is composed of seven members appointed by the Secretary, not more than four of which may be members of the same political party, and four ex officio members, including the Commissioner of Education, the Director of the National Institute of Education, the Director of the Census, and the Commissioner of Labor Statistics. The appointed members serve three year terms, and the Assistant Secretary for Education sits as the non-voting presiding officer of the Council.

For fiscal year 1977 the Council was budgeted at $26,000. Actual expenditures have totaled $21,673. That breakdown as follows:

Travel	$ 9,575
Honoraria	5,600
Other	498
Recording and Transcripts	6,000
	$21,673

Staff time provided to the Council is the equivalent of 1.5 years of professional service and 0.5 year of clerical service. Staff expenditures amount to approximately $45,000.

The Council is required to meet at least four times each calendar year, and, in addition, at such time as three voting members request the presiding officer to call a meeting. A government official is required to be at all meetings. The NCES staff proposes an agenda for the consideration of the Council members, and, after consultation, this agenda becomes the basis of the next Council meeting. Typically, such a meeting will have one or more themes to be pursued in depth, and NCES staff presents reports and background materials on several facets of its program to keep the Council abreast of NCES developments. After evaluating staff reports, the Council then considers alternatives and makes recommendations for implementation by NCES.

I would like to now summarize various accomplishments of the Council since its establishment. There has been consensus about the priority of certain areas, upon which discussion has focused during not only the past year, but the previous year as well.

Standards

One of the Council's mandated responsibilities is to "establish standards to insure that statistics and analyses disseminated by the Center are of high quality and are not subject to political influence." In response to the Council's concern for standards, NCES is developing the following six issue papers:

1) Standard Guidelines for Project Files; 2) Guidelines for Technical Reviews and Rating of Proposals; 3) Guidelines for NCES Internal Review; 4) Guidelines for NCES Staff in Project Monitoring; 5) Guidelines for Writing RFP's; and 6) Standards for the Use of Imputations.

Analysis

The Council recommended that joint monographs be done, pairing NCES staff with outside experts to achieve not only analytical monographs but also enhancement of NCES staff capabilities. NCES has begun to implement this recommendation. In addition, NCES has begun a program of "Administrator's Fellows" in which staff members are encouraged to submit proposals for analytic monographs and, if successful, are given released time to prepare them. Further, NCES's reorganization has created a revised structure which recognizes an expanded role for analysis activities.

Independence

The Council is concerned that NCES should maintain a degree of autonomy and independence consistent with the role of a general purpose statistical agency, emphasizing statistical professionalism, and assuring that its products and activities have an actual and perceived non-political character.

In the area of data releases, the Council has passed a resolution to the effect that NCES should have full responsibility for the release of statistical data, including determination of content, format and comment.

With respect to assignments and activities, the Council has also developed a policy on collecting and processing of externally requested data. This matter has occasioned considerable debate and discussion during the past year with particular concern about data for purposes of compliance enforcement, program evaluation, or regulation. While the Council endorses NCES cooperation in the efforts to eliminate unnecessary data collection and reduce paperwork burdens on respondents, its members believe that this must not impair the effectiveness of the Center as a general purpose statistical agency.

Mandates

The Council has expressed concern about the effect on the Center of special legislative mandates and special Departmental and Divisional assignments. The Council believes that unless accompanied by a corresponding allocation of resources, these mandates may impair the Center's ongoing assessment of the condition of American education.

Staffing/Contracting

The Council has expressed concern about the high proportion of the Center's work being contracted out and has recommended that the Center be given the additional staff necessary to permit a significantly greater proportion of its work to be done by NCES staff.

Coordination and Cooperation

The Council supports NCES' work in coordinating education data collection activity through the Education Data Acquisition Council (EDAC), legislatively established by P.L. 94-482. This body, directed by an NCES staff member, has responsibility for approving the data collection plans and activities of the entire Education Division and the Office of Civil Rights in HEW.

In addition, the Center made education data widely available through its publication and dissemination programs, including the EDSTAT computer-based system, its work with a consortium of Federal education data users, and the publication of its annual Condition of Education report.

Through these coordinative activities the Center is attempting to reduce respondent burden and the impact of Federal paperwork.

Attached to my written statement for inclusion in the record is the Advisory Council's charter and membership list.

I would be happy to answer questions that you may have.

ADVISORY COUNCIL ON EDUCATION STATISTICS

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CHARTER

ADVISORY COUNCIL ON EDUCATION STATISTICS

PURPOSE

Section 501 of the Education Amendments of 1974. P.L. 93-380 establishes within the Office of the Assistant Secretary, a National Center for Education Statistics for the purpose of collecting and disseminating statistics and other data related to education in the United States and in other nations. The Center is charged with the following responsibilities:

(1) collect, collate, and from time to time, report full and complete statistics on the conditions of education in the United States;

(2) conduct and publish reports on specialized analyses of the meaning and significance of such statistics;

(3) assist State and local educational agencies in improving and automating their statistical and data collection activities; and

(4) review and report on educational activities in foreign countries.

Effective discharge of the responsibility by the Center requires the advice and counsel of an Advisory Council on Education Statistics with representatives from the educational community as well as the statistical community.

AUTHORITY

This Council is mandated by Sec. 406(c) of the General Education Provisions Act as added by Sec. 501(a) of the Education Amendments of 1974, P.L. 93-380, (20 U.S.C. 1221e-1(c)). The Council is governed by applicable provisions of both the Federal Advisory Committee Act, P.L. 92-463 (5 U.S.C. Appendix I) and of Part D of the General Education Provisions Act (20 U.S.C. 1233-1233h).

FUNCTION

"The Council shall advise the Secretary of HEW and the Assistant Secretary for Education and shall review general policies for the operation of the Center and shall be responsible for establishing standards to insure that statistics and analyses disseminated by the Center are of high quality and are not subject to political influence.

The Council has some operational as well as advisory functions and the provisions of the Federal Advisory Committee Act are not applicable to the operational functions of the Council.

STRUCTURE

The Advisory Council on Education Statistics shall be composed of 7 members appointed by the Secretary and such ex officio members as are listed below. Not more than 4 of the appointed members of the Council may be members of the same political party.

The ex officio members of the Council shall be:

The Commissioner of Education
The Director of the National Institute of Education
The Director of the Census
The Commissioner of Labor Statistics.

Appointed members of the Council shall serve for terms of 3 years, as determined by the Secretary, except that in the case of initially appointed members of the Council, they shall serve for shorter terms to the extent necessary that the terms of office of not more than 3 members expire in the same calendar year.

The Assistant Secretary shall serve as the non-voting presiding officer of the Council.

MEETINGS

The Council shall meet at the call of the presiding officer, except that it shall meet at least four times during each calendar year; and in addition, whenever three voting members request in writing that the presiding officer call a meeting.

Six members of the Council shall constitute a quorum of the Council.

Meetings will be governed as required by 45 CFR 11, OMB Circular A-63 (Rev.), and P.L. 92-463. Meetings may be closed to the public when agenda items are concerned with operational functions.

COMPENSATION

Members who are not full-time Federal employees shall be paid at the rate of $100 per day, plus per diem and travel expenses in accordance with Standard Government Travel Regulations.

ANNUAL COST ESTIMATE

Estimated annual cost for operating the committee, including compensation and travel expenses for members but excluding staff support is $25,000. Estimate of annual manyears of staff support required is 1.25, at an estimated annual cost of $35,000.

REPORTS

The Council shall submit to the Congress on or before March 21 of each year a report which shall contain as a minimum a list of the names and business addresses of the Council members, a list of the dates and places of meetings, the functions of the Council, and a summary of Council activities, findings and recommendations made during the preceding calendar year.

DURATION DATE

The Council will terminate June 30, 1977 unless extended by law. This Charter will terminate on August 21, 1976 at which time a new Charter will be filed as required by Sec. 7(b)(2) of OMB Circular A-63.

APPROVED:

JUL 29 1975
Date

Secretary

Dr. RELIC. In anticipation of further questions, I have asked the Chief Planning Officer and Assistant to the Director for the National Center of Educational Statistics, Ms. Garfield, to attend this meeting.

Pertaining to your questions on the procedures of the NCES Advisory Council and its budget, its expenditures, its duties and responsibilities and accomplishments, I would point out it is directly accountable to the Secretary of the Department of Health, Education and Welfare and to the Assistant Secretary for Education.

It is also accountable through its annual March report of its activities to the Congress.

Established in 1974, the NCES Advisory Council meets a minimum of four times annually. Its responsibilities include a complete assessment of the general policies nd activities of NCES and reactions and recommendations to NCES to improve its procedures. Specifically, the Advisory Council is involved with being certain that the standards of operation of NCES assure that its statistics and the analyses disseminated are objective and of the highest quality. Some of the spcific issues involving the council currently are the adequacy of funding for NCES compared to its mandated studies; an assesment of staff positions and responsibilities in comparison to work that is contracted out of NCES; the important study of the Federal paperwork burden and its impact upon the education community, and a consideration of the quality, impact and utility of NCES's studies and an analysis to the entire education community and to the agencies of the Education Division.

Chairman Perkins' questions included budget. The Advisory Council for NCES has a very limited budget of $26,000 annually. The fiscal 1977 expenditures have amounted to just $21,000. In addition, of course, valuable professional and clerical time from

NCES is also involved with the activities of the Advisory Council. We estimate that this is approximately $45,000.

Concerning its recent accomplishments, the Council has insisted that NCES do everything possible to maintain high standards in all of its opertions and, as a consequence, the staff of NCES is currently involved in developing papers to improve its procedures on the writing of requests for proposals, its project monitoring, its technical review of all its operations.

Perhaps no matter is being discussed more, and generating more paper than the attempt to reduce the Federal paperwork burden. The Advisory Council to NCES is attempting to recommend a balance between eliminating unnecessary data collection to NCES and at the same time being certain that it pursues all of its mandated and other studies which, of course, do require considerable data collection from the states and from the local districts.

In conclusion, I would point out that one of its great accomplishments is the expertise that the Council for NCES brings together on its very limited budget. Its members include the Commissioner of Education for the State of Connecticut; the President of the Social Science Research Council in New York; the Librarian of the State of Calfornia; the Dean of the School of Business Administration of Atlanta University in Atlanta, Georgia; the Director of Statewide Evaluation for Post-Secondary Education for the Education Commission of the States, and a member of the Learned Scholars' Institute at the University of Florida in Gainesville.

There is also participation by ex-officio members who include the Director of the Bureau of Census of the Department of Commerce; the Commissioner's Office of the Bureau of Labor Statistics in the Department of Labor and the Commissioner of the Office of Education and the Director of the National Institute of Education. The Chairperson for the Advisory Council is the Assistant Secretary for Education.

Thank you, Mr. Chairman.

Mr. KILDEE. Thank you very much, Dr. Relic. I think that completes the testimony from the panel.

I would like to ask the chairpersons of the various advisory councils just one question. I am looking at certain advisory councils at the local level I have had some experience with back in Michigan.

Do you think you are looked upon in, say, HEW or in the U.S. Office of Education as intrusive; that is, you are intruders to be tolerated, or intrusive where you are there to intrude new ideas and information needs, or none of the above?

Would anyone care to comment on that or would you prefer to punt?

Dr. LEWIS. Mr. Chairman, I would be happy to comment on that.

I think the record here today even speaks to that. I believe there is a view that advisory councils are intrusive. For example, in the testimony from the Office of Education there was the suggestion that there was a need for less advisory groups, but the same testimony carried the suggestion there was a need for more in the case of state and locals. There was even the suggestion that advisory councils are looked upon at the local level as being intrusive.

That may be the case, but I have been a school administrator for 17 years. I have never viewed advisory groups in that manner and I don't now, and I am superintendent of a district which I believe has the outstanding example in the country of an advisory structure at all school levels, at the area level within the district, on a districtwide basis, which is not mandated by the Federal or State government, but which grew out of an interest of local citizens who made such a proposal to a local Board of Education, and such groups have now been put in place.

While it may be true there may be some districts where this occurs, I believe there is substantial evidence that there are districts which have been influenced by advisory councils and by Federal legislation where these kinds of mechanisms are now moving in a very constructive and positive way and I would suggest that these instances make the case for this kind of involvement at the federal level.

I will just close by saying that it is not always easy to work with these groups. Advisory groups can be conflict-oriented, combatative to a certain extent, but I find when they are such there is a reason. That is the reason I support them, because they are dealing with legitimate issues that need to be addressed if the education of boys and girls in this country is to be what we expect it to be, and that is effective.

Mr. **Kildee**. Thank you very much. Dr. Alford.

Dr. **Alford**. If I may respond briefly to that, I would want to emphasize that I don't think my testimony said there should be more state and local advisory councils. I did say in general terms our program people feel that the state and local advisory councils under their programs have been effective and they support them. I think my statement urged caution in looking at this, but recognized that they do serve a real value.

I think one of the problems we face in looking at advisory councils is the problem of unsolicited advice. In a sense, advisory councils have been created for a number of reasons at the national level. In some cases, for example, the administration may have requestd such councils in legislation proposals that they have submitted. I think where the executive branch asks for the creation of an advisory council then it is likely to receive that advice and utilize the advice.

On the other hand, I think in a number of programs the advisory councils have been created by the Congress and they have said, in effect, "You will advise the President, the Secretary, the Commissioner and the Congress on these matters."

Well, I think it is like giving advice to children and a lot of other unsolicited advice that goes around. If you haven't asked for it or are not in the mood to take it, perhaps you don't view that as the best mechanism.

I did indicate in my testimony there will probably continue to be a need for advisory councils at the national level, but I think we would prefer to use the authority that you have given us to create these councils as they are needed for a fixed term so that they may be used to provide advice, put it into effect, and then maybe move on to other areas.

This may be something that runs implicitly through this whole process that we haven't really focused on, but I think it is something worth considering. Whether the Congress needs to review the process and in some cases where they develop legislation, if they want an advisory council for themselves, they approach it in those terms, and maybe think of whether that is the best way to do it for the executive branch. At least, it should be considered whether it is going to have the most effect if you do it that way for the executive branch.

Mr. Kildee. Is there any further comment on that?

Ms. Simonson. In response to your question, Mr. Chairman, I would say that the National Advisory Council on Women's Educational Programs has found some of each type of experience that you asked us about. There were certainly many instances where we found the officials in HEW and the Office of Education welcomed our advice and acted on it and particularly the office responsible for administering the Women's Educational Equity Act has picked up a number of our specific recommendations and said they were helpful. So have some other offices to whom we have offered advice, but certainly not all of them.

I wouldn't expect that we could bat one thousand, but we feel there are places where our advice is probably considered intrusive. They haven't told us quite that to our face, but the less than perfect response to our recommendations would lead us to believe that. But I think that is to be expected and it will not deter us from offering further advice when we think it is useful.

Mr. Kildee. Mrs. Awsumb.

Mrs. Awsumb. Our council does mandate a council within the legislation itself to review and give advice on the criteria for regulating the dispensing of the funds that cover the programs for those matters, the Emergency School Aid Act, and I have a definite feeling, and I think I speak for the Council, that we have had lots of cooperation and response in many ways from the Office of Education, but I feel there is a difference between when Congress legislates and says, "This and this and this shall be done," and then regulations are written over at the bureaucratic level and an avisory council, so to speak, represents the public comment on seeing to it that the regulations reflect the intent of the Congress and do not deviate too far.

I happen to be presently involved in another area of bureaucracy of the Federal Government in my present full-time position and I am coming to recognize more and more that oftentimes regulations are prone to deviate from the intent of Congress sometimes, and I feel this is good to have advisory councils to keep bureaucrats on the track.

Mr. Kildee. When I was in Michigan I was a co-sponsor of a bill that made all rules and regulations subject to approval of the legislature. The first year we turned down about 80 percent of those passed. That had kind of a chilling effect on the proposals of rules and regulations.

Mr. Levitas of Georgia has introduced similar legislation at the Federal level.

Mr. Meyer. How many times from a local level I have heard local administrators say "Gee, we have an advisory council committee meeting coming up, let's get that over so we can do what we want to do."

Ofttimes that is an attitude that is taken at various levels. Of course, I would not certainly imply that happened any place else except at the local level, but I know also that it is important that all aspects of the governmental structure be involved.

It seems to me that the advisory councils provide that kind of input again at a local level. If I am not mistaken, I heard a suggestion in Mr. Alford's comments a few minutes ago that perhaps it would be advisable to allow the Office of Education or other offices to establish advisory committees as need arose and so forth, and that would not be part of Congress's realm. I think that is an important part of Congress's realm.

I think as congressional members you have exercised your concern that particulr legislation be carried out by having kind of a citizens' committee to have input into and to make suggestions to. I am a very strong supporter of the political system that we operate under. We all have the opportunity to have an input at one level or another. That is what makes our government go. That is what makes our system operate.

I really like to see citizen participation. I think that is the name of the game. I strongly support that role on your part.

Mr. KILDEE. Thank you very much.

Anyone else care to comment?

Mr. Essex.

Mr. ESSEX. Mr. Chairman, I would be of the opinion that if we were to place all of the advisory groups in balance, we would find we were on the light side rather than the heavy side. The tenor of sentiment throughout the country is one of doubt, the gap in governance about all of our institutions, whether it be church, government, education, whatever.

In the last campaign for the presidency, I think we were quite aware that the ideas would come from the grass roots, not from the Potomac. Potomac would be a bad—well, I am not sure I have the right word, but the public was concerned. The idea of citizen participation was basic to that campaign.

In Ohio as state superintendent, well, longer than any of my 19 predecessors so I will not say how long, but we had a book, about one and a half inches thick, about advisory groups, indexed so we do not get the same people on two, three or more times. I could not function without it, frankly.

I found the same was true in Akron when I was superintendent there for a decade. It was an industrial kind of city, many segments bringing their heritage from wherever, and the advisory council was an indispensable kind of operation with me. Citizen participation is the answer to resurgence of confidence in the American Government, in my opinion; carefully selected, carefully designed, operative, and I think we are making progress in that direction.

I have had no criticism of the community education movement, it has all been enthusiastic, but the recommendations as we sat in Flint, on a snowy day a year or so ago, and into the evening, listening to more than 60 persons who wanted to address this committee, we learned and adopted and changed as a result.

I think we are on the light side rather than the heavy side.

Mr. **Kildee**. Thank you very much.

Mr. **Lehmann**. Mr. Chairman, if I had to identify, let's say, one major sin which our council would be guilty of, it is possibly fostering a false sense of security, because in our experience, having gone through numerous public hearings and sitting through as many as 50 or 60 witnesses within a 7-hour period, the enthusiasm, the concern, the interest, the intense commitment to the principle of, in our case, bilingual education and the education of children, was the fact that in many instances their hopes, their encouragement, their support, which was placed on our shoulders in many instances, would not be able to be consummated or executed becuase of the limitations of our council. That would be our one sin of omission.

Mr. **Kildee**. All right. Thank you very much.

Mr. **Eyre**. Mr. Chairman, I would like to address not only your question, but a comment made by the Administration relative to the grouping of councils commensurate with an organization plan of Dr. Boyer, which gets at your point.

Councils are charged by Congress, all of them, to look at programs and administrative effectiveness for you and for the executive branch. It is difficult, if not improper, to render sound advice to and about an agency if you are in fact tied to that organization. For that very reason our council cannot buy the Administration's recommendations relative to the grouping process for the existing councils. If they are tied or we are tied to the organization plan of Dr. Berry or Dr. Boyer or both of those individuals, I cannot see how sound advice can be rendered in terms of program and administrative effectiveness if we are tied to them organizationally and dollarwise.

Thank you, sir.

Mr. **Kildee**. Thank you, Mr. Eyre.

Mr. **Thompson**. I think in terms of the National Advisory Council on Indian Education, the whole idea of citizen participation, participatory democracy, the concept of councils and committees, goes with Indian people like ham goes with eggs. The five civilized tribes in their governmental structures, their concepts of participation, found avenues of course in the Constitution of this country. The founding non-Indian fathers of this Nation recognized those as very sound governmental practices.

I think that there is another issue in terms of the Indian community. People who have been economically deprived lack several words in their functional vocabulary. One of the things that many Indian people and many poor people lack in their vocabulary is deferred gratification. When a person has a problem, it is difficult to rspond in terms of 'Go see Mr. So-and-So," or "Come back on Monday," or "If you will wait until Friday we will meet and discuss your need."

In terms of our council the whole idea of participation, it is very rare that a week goes by that council members are not called by various constituents within the State via the telephone or whatever and people have immediate problems in terms of their educational programs, in terms of their communication with the State bureaucracy or the Federal bureaucracy.

I feel that our council has really become a functional rather than an advisory council; advisory, at least in our sense, is basically a misnomer.

Mr. **Pressler**. I want to ask Mr. Thompson if the Advisory Council on Indian Education ever considered a review of BIA and its educational programs.

Mr. **Thompson**. Within our mandate we are charged to review all programs as they apply to American Indian learners. Currently of course there are thoughts on such a council for the Bureau of Indian Affairs. We formally have not served in that capacity.

This year, however, we have entered into a working relationship with the bureau wherein we have reviwed or are in the process of reviewing several of the structural changes that the bureau hopes to accomplish in terms of direct funding, of reestablishment of the area offices, the boarding dormitory structure, and so on. Formally, no; informally, yes.

Mr. **Kildee**. All right.

The Chair would like to ask Mr. Buchanan if he has any questions.

Mr. **Buchanan**. Thank you, Mr. Chairman.

I think I will follow the example of our colleague Bill Ford and make a speech first.

Mr. **Kildee**. That is not uncommon around here.

Mr. **Buchanan**. Dr. Alford, I really appreciate your candor a moment ago. I had said to counsel that I wonder if the executive branch has a different outlook on those advisory councils that we create and they do not request and those that they do request to be created.

You certainly answered my question before I asked it.

I would like to make plain to the whole panel, and it may come as no surprise to you that neither this committee nor, so far as I can ascertain, its staff was consulted on any of these recommended changes and groupings of the advisory councils. I suppose that may be none of our business, but we were not consulted.

Dr. Alford, I am constrained to say that these councils do, in fact, advise the Congress, very specifically. For example, the recent vocational education and career education amendments to which Ms. Simonson referred in her testimony, specifically included your council's recommendations and became the substance of the amendments which the Congress passed into law.

Also, if we do not listen here, we do not survive. I am subject every other year to the judgment of the people of the 6th Congressional District of Alabama, all of whom comprise a great advisory council to me. There are many different groupings of them; individually they advise me rather extensively as we go along. If we do not listen, we do not survive, and if we do not listen here we cannot carry on our business. This is a hearing in which we are being advised by these advisory councils right now.

So that those of us in Congress who created the Office of Education by our legislative action, and who also created advisory councils to advise the Office of Education by our legislative action, feel that we are doing something right and proper when we say "Hey, those of you who never have to get elected, who are there for a lifetime, if you do not get into some kind of terrible trouble by something incredibly wrong you do, guaranteed your continuing position in the Office of Education, a position of responsibility, we think you too need to listen to what various groupings of the people have to say who have expertise in some problem area."

I am very high on our new Commissioner of Education. I am all for the President's attempts to reorganize and streamline the government. But I do believe if I were running the Office of Education I would have been a physician healing myself first before I did this extensive healing of the advisory councils. If I were the President I think that I would look last to cutting down citizen input into this great establishment in Washington and look first toward finding ways to refine or reform and reorganize that establishment itself.

I would be glad if anybody from OE wants to respond to that little speech.

Mr. KILDEE. May I use that speech in my district, Mr. Buchanan?

Dr. ALFORD. Yes, I would like to respond, Mr. Buchanan, because I want to make it clear that I do not think there is as much disagreement as may have appeared. Maybe I garbled my statement or something of that nature.

Mr. BUCHANAN. I appreciate your candor.

Dr. ALFORD. I may have been overcandid in this, but I just think I had to say it, the factor of unsolicited advice.

Part of the problem is, I think, the definition hit at by Mr. Thompson. If we are talking about advisory commissions, as advisory commissions that is one thing, but many of these commissions are serving a number of other functions which I mentioned in my statement. But in no way would I want to imply that we are not in favor of citizen participation.

As a matter of fact, I tried to make a very special point in the statement that one of the reasons we think that the advisory councils no longer are as necessary as they once were is that we have moved in other ways to bring direct citizen participation into our process of developing legislation proposals at the executive branch level, which I would admit in the past we have not been good at doing and still have a long way to go.

In the regulation-developing process and so forth, at one point the advisory council was probably the only source for public input if we go back a decade. What we are saying is if the advisory councils are relying on their role of bringing to bear public opinion, then I am not at all certain that we do not have now more direct means of doing this which may be even better than the advisory committee operation. Maybe there are other functions they need to fulfill.

In the case of Indians, it is very directly related to the operation as a functional part of the programn. There are other functions here that you may consider. I did not mean to imply that they were not advising Congress. That is their function, I know they do and I know many occasions where you have taken their advice.

I was referring in my remarks to the impact on the executive branch per se and I think most of the advisory council members would probably recognize that their impact has not been as great in this advisory capacity on the executive branch as it has been on the Congress.

I have worked with them over the years, I know the members. I do not want to be in the position of opposing these people. It is not to be taken in that light. I know many of them personally.

We do have to recognize where things are changing and we believe perhaps this structure can be changed. We certainly need to listen, I can only agree with you wholeheartedly on that.

If I thought that to reduce the number of advisory councils or reorganize them into this new kind of structure was going to diminish that role, then I would say we should not do it

Mr. **Buchanan**. Thank you very much. I appreciate the sincerity of your response.

I have found that the Washington level of the Federal Government tends to be somewhat more responsive, like local government. I think the worst idea ever introduced in the government was the Nixon and Ford initiative to give much of the decision-making process to the regional levels of the Federal Government, because there you get a bureaucracy completely buffered from the Congress, the people, and everybody else. I am pleased to hear this responsiveness at least from this highest level of government.

Could you tell me why the groupings appear to be along programmatic lines?

I know this is locking the stable after the horse has gone in terms of your recommendations. It seems to me, for example, career education would not seem to fit logically with bilingual. I would assume career education would seem more properly in the National Advisory Council on Education and Work, if it has to be combined at all.

Dr. **Alford**. It may be a little misleading to think of these as combinations of those advisory councils. In my testimony I grouped and I tried to express it this way, "to cover the areas of" is the phrase I used. Obviously you cannot take two advisory councils and just jam them together and end up with a new advisory council which is going to be very meaningful. These would be designs to provide advice, advice in the true sense of an advisory council, to each of our program areas.

Now the fifth one, the one that involved career education and bilingual education, was a grouping to take care of all of those programs which the Congress or we in some cases decided to place in the commissioner's office and are not related to our normal bureau structure.

For example, I did indicate here that we would expect to cover other areas such as Right To Read, Teacher Corps, Arts and Humanities, and so forth.

I think in some of the thinking that went into developing this proposal, the concept was broached that within this broader advisory council there would be subcommittees that would look perhaps at each of these separate areas. So I have to admit on the surface I cannot give any rationale for putting career education with bilingual education per se. But within this broad grouping of separate programs that are not related in any way—they simply happen to be in the Office of the Commissioner—that kind of advisory council was proposed.

While you could make the argument that career education would relate more closely to education and work; we should note there has been a strong concern of not tying career education closely to vocational education, for example, or any other concept, but keeping it as a separate concept alone.

Mr. **Buchanan**. Your response causes me to ask if there might be a lack of understanding of career education itself. We hoped it would permeate the whole of education in the United States, not be treated as some little special add-on program. That was the concept intended by the Congress.

Would you say that concept is shared by the Office of Education?

Dr. **Alford**. I think I would have to say, if you talk to two different people you are not absolutely clear as to what career education is. Most of us would agree it is a broad concept, therefore it cannot be neatly placed in say an education and work concept or another area. That was the reason.

I would also comment, from the hearings yesterday when Dr. Boyer presented his views on what might be needed in terms of reorganization and so forth, that some of the problems in connection with this fifth grouping—the grouping that I have in my testimony-reflects the Office of Education structure at the present time. But Dr. Boyer does have in mind hopefully providing a more rational organization and bringing some of these things together in a way that might end up with an advisory council grouping, in this fifth category at least, which would take on a little different form.

Mr. **Buchanan**. Do you expect significant budget savings from these groupings?

Dr. **Alford**. There are some dollar savings we have been able to identify. Obviously when you combine 11 into 5 you are going to get some savings. But we have not been able to nail down specifically the actual total dollar savings cost. The dollar savings cost in the advisory council review of the total Federal government is probably significant because if you look at the President's memorandum of February 15, you will note that there is a little less than 1200 Federal advisory councils in the Federal Government as a whole. He is looking at this vast number of advisory committees which cost many millions of dollars to operate each year.

In our case, we are probably talking of savings, I suppose, in the hundreds of thousands of dollars, but we have not been able to nail that down precisely.

Mr. **Buchanan**. Thank you, Mr. Chairman. I know I exceeded my time.

Mr. **Kildee**. Your questions were so good I did not keep track.

Dr. Alford, budgets of the ten advisory councils represented here today range from $40,000 to $300,000. Could you explain to the committee the criteria which the Office of Education uses in determining how much each one of these advisory councils ought to receive each year in its budget?

Dr. **Alford**. Unless Ms. Bailey wants to add to my remarks, I am going to have to confess that it is not that precise kind of development. This may be described as incremental budgeting, I suppose. It is whatever you did initially tends to be carried on from one year to the next.

I think only in vocational education have you provided an actual line authority for supporting that council. But in most cases we have made an initial determination at some point as to how much activity this council is going to carry out and what dollars this would require in terms of staff and so forth.

We have proceeded from that point, probably historically carried it out. There have been some ups and downs between the councils. Maybe we should provide something for the record, maybe a little more justification for the record.

In some cases we are providing direct support through the office. So that does not appear as a budget item, but there are staff services being provided. I think that appears in the GSA report, however. We have to give a reflection of the amount of benefits we are providing there. That is probably the more accurate presentation as far as the dollars are concerned.

Mr. KILDEE. If you could supply that to the committee we would appreciate it.

[The information requested follows:]

FILE COPY

Interagency Report Control No. 1151-GSA-[illegible]

ANNUAL REPORT ON FEDERAL ADVISORY COMMITTEES SUMMARY SHEET

1. DEPARTMENT OR AGENCY: HEW/OE

2. CALENDAR YEAR: 1976

3. EXACT NAME OF ADVISORY COMMITTEE (List alphabetically. See SF 248, Block #1. Indent and list subcommittees or other subgroups under parent committee.)	COMMITTEE STATUS DURING THIS CY a. New	b. [illegible]	c. [illegible]	d. [illegible]	e. [illegible]	ESTABLISHMENT AUTHORITY a. Directed by law	b. Authorized by law	c. Established by agency authority	d. Presidential directive	COMMITTEE TYPE a. Ad hoc	b. Continuing	c. Presidential	TOTAL NUMBER REPORTS	MEETINGS a. Total open	b. Total closed	c. Total partially closed	PERSON-YEARS Federal Staff Support (Whole Numbers & Fractions) Current year	Next year	COSTS Total Annual Cost Current Year (Whole Dollars)	Total Annual Cost Next Year (Whole Dollars)	TOTAL NUMBER OF MEMBERS
	SF 248 Block # 4					SF 248 Block # 5				SF 248 Block # 6			SF 248 Block # 13	SF 248 Block # 14			SF 248 Block # 15a		SF 248 Block # 15b		SF 249 Block # 4
Accreditation and Institutional Eligibility Advisory Committee		X						X			X		1	11	0	1	7	7	200,520	217,220	15
Advisory Committee on the Education of Bilingual Children				X		X					X		0	0	0	0	0	0	0	0	8
Advisory Council on Developing Institutions		X				X					X		1	3	0	0	1 2/4	1 2/4	52,003	75,000	9
Advisory Council on Environmental Education		X				X					X		1	6	0	0	1 2/4	3/4	35,69[illegible]	48,050	14
Advisory Council on Financial Aid to Students		X				X					X		1	4	0	0	1 2/4	1 2/4	60,000	65,000	20
Community Education Advisory Council		X				X					X		3	5	0	0	1 1/4	1 1/4	182,000	273,000	7
National Advisory Committee on the Handicapped		X					X				X		2	4	0	0	2 3/4	2 3/4	128,149	133,069	15
National Advisory Council for Career Education		X				X					X		1	6	0	0	1 1/4	1 1/4	150,133	260,861	8
National Advisory Council on Adult Education		X				X					X	X	2	13	0	0	7	7	291,842	291,359	15
National Advisory Council on Bilingual Education		X				X					X		1	12	0	0	2	2	136,000	136,000	14

[illegible] summary sheet is required, use this same form SF 250 [illegible]

(See instructions on reverse)

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STANDARD FORM 250 (Rev. 5-[illegible])

Interagency Report Control No. 1101-GSA-AN

ANNUAL REPORT ON FEDERAL ADVISORY COMMITTEES SUMMARY SHEET

1. DEPARTMENT OR AGENCY: HEW/OE

2. CALENDAR YEAR: 1976

EXACT NAME OF ADVISORY COMMITTEE (List alphabetically. See SF 248, Block 2/3. Indent and list subcommittees or other workgroups under parent committee.)	COMMITTEE STATUS DURING THIS CY					ESTABLISHMENT AUTHORITY				COMMITTEE TYPE			TOTAL NUMBER REPORTS	MEETINGS			PERSON YEARS Federal Staff Support (Whole Numbers & Fractions)		COSTS		TOTAL NUMBER OF MEMBERS
	a. New	b. In existence at end of CY	c. Term. by merger	d. Term. by abolishment	e. Term. by expiration	a. Directed by law	b. Authorized by law	c. Established by agency authority	d. Presidential directive	a. Ad Hoc	b. Continuing	c. Presidential		a. Total open	b. Total closed	c. Total partially closed	Current year	Next year	Total Annual Cost Current Year (Whole Dollars)	Total Annual Cost Next Year (Whole Dollars)	
	SF 248 Block # 4					SF 248 Block # 5				SF 248 Block # 6			SF 248 Block # 13	SF 248 Block # 14			SF 248 Block # 15a		SF 248 Block # 15b		SF 249 Block # 4A
National Advisory Council on Education Professions Development					X	X					X	X	4	3	0	0	4 2/4	0	186,250	0	10
National Advisory Council on Equality of Educational Opportunity		X				X					X	X	1	9	0	0	3 2/4	4 2/4	179,000	183,000	14
National Advisory Council on Ethnic Heritage Studies		X				X					X		1	3	0	0	3/4	1	31,000	40,000	10
National Advisory Council on Extension and Continuing Education		X				X					X	X	1	15	0	0	6 2/4	6 2/4	325,931	263,368	18
National Advisory Council on Indian Education		X				X					X	X	1	4	4	2	4 2/4	4 2/4	265,778	246,652	15
National Advisory Council on the Education of Disadvantaged Children		X				X					X	X	2	12	0	1	8 2/4	8 2/4	281,825	281,505	10
National Advisory Council on Vocational Education		X				X					X	X	9	10	0	0	12 2/4	12 2/4	437,965	437,410	21
National Advisory Council on Women's Educational Programs		X				X					X	X	1	32	0	0	6	6 3/4	316,712	316,588	20
National Council on Quality in Education				X		X					X	X	0	0	0	0	0	0	0	0	0
		16		2	1	18		1			19	9	33	152	4	4	72 2/4	69 1/4	3,267,800	3,270,082	243

STANDARD FORM 250 (Rev. 1-76)

U.S. OFFICE OF EDUCATION
Committee Management Staff
400 Maryland Avenue, SW., Washington, D.C. 20202

August 15, 1977

Chris:

Here is the compilation you asked for at the hearing. It's in the same format as the 1976 data, but if you would prefer it another way, let me know. I left the worksheet attached too, for immediate comparison.

Some comments: Bilingual and Ethnic show a significant increase in the number of meetings. I would attribute that to a revised subcommittee structure and more activity in that direction. Under the ground rules of this GSA report, each subcommittee meeting counts as a separate meeting. Thus, three subcommittees meeting simultaneously, followed by a full council meeting are four, for the purposes of this report, although we would normally refer to this set as "a meeting".

The decrease for Voc Ed is due to a tighter budget.

The backup material is also attached, showing how each total was derived.

Please call - 245-7960 - if you have any questions.

Ann

Ann V. Bailey
Committee Management Officer

cc: Jack Jennings

Meetings held from January 1 - July 31, 1977

Council	MEETINGS a. Total open	 b. Total closed	 c. Total partially
Accreditation and Institutional Eligibility Advisory Committee	7	0	0
Advisory Council on Developing Institutions	2	0	0
Advisory Council on Environmental Education	2	0	0
Advisory Council on Financial Aid to Students	3	0	0
Community Education Advisory Council	3	0	0
National Advisory Committee on the Handicapped (terminate 9/30/77)	2	0	0
National Advisory Council for Career Education	4	0	0
National Advisory Council on Adult Education	8	0	0
National Advisory Council on Bilingual Education	17	0	0

Meetings held from January 1 - July 31, 1977

Council	MEETINGS a. Total open	 b. Total closed	 c. Total partially
National Advisory Council on Equality of Education Opportunity	5	0	0
National Advisory Council on Ethnic Heritage Studies	18	0	0
National Advisory Council on Extension and Continuing Education	16	0	0
National Advisory Council on Indian Education	2	1	1
National Advisory Council on the Education of Disadvantaged Children	12	0	1
National Advisory Council on Vocational Education	2	0	1
National Advisory Council on Women's Educational Programs	19	0	1
TOTAL	122	1	4

Interagency Report Control No.

ANNUAL REPORT ON FEDERAL ADVISORY COMMITTEES SUMMARY SHEET

1. DEPARTMENT OR AGENCY: HEW/OE

2. CALENDAR YEAR: 1977

EXACT NAME OF ADVISORY COMMITTEE	COMMITTEE STATUS DURING THIS CY (SF 248 Block 4)	ESTABLISHMENT AUTHORITY (SF 248 Block 5)	COMMITTEE TYPE (SF 248 Block 6)	TOTAL NUMBER REPORTS (SF 248 Block 13)	MEETINGS a. Total open	MEETINGS b. Total closed	MEETINGS c. Total partially closed	PERSON-YEARS Federal Staff Support Current year	PERSON-YEARS Federal Staff Support Next year	COSTS Total Annual Cost Current Year (Whole Dollars)	COSTS Total Annual Cost Next Year (Whole Dollars)	TOTAL NUMBER OF MEMBERS
Accreditation and Institutional Eligibility Advisory Committee	X	X	X	1	7 11	0 0	0 1	7	7	200,520	217,220	15
Advisory Committee on the Education of Bilingual Children	X	X	X	0	0	0	0	0	0	0	0	8
Advisory Council on Developing Institutions	X	X	X	1	2 3	0 0	0 0	1 2/4	1 2/4	52,003	75,000	8
Advisory Council on Environmental Education	X	X	X	1	2 6	0 0	0 0	1 2/4	3/4	35,695	45,030	14
Advisory Council on Financial Aid to Students	X	X	X	1	3 4	0 0	0 0	1 2/4	1 2/4	60,000	65,000	20
Community Education Advisory Council	X	X	X	1	3 5	0 0	0 0	1 1/4	1 1/4	187,000	223,000	7
National Advisory Committee on the Handicapped Term. 9/30/77	X	X	X	2	2 4	0 0	0 0	2 3/4	2 3/4	128,149	133,069	15
National Advisory Council for Career Education	X	X	X	1	4 6	0 0	0 0	1 1/4	1 1/4	150,133	260,861	8
National Advisory Council on Adult Education	X	X	X	2	8 13	0 0	0 0	7	7	291,842	291,359	15
National Advisory Council on Bilingual Education	X	X	X	1	17 12	0 0	0 0	2	2	136,000	136,000	16

STANDARD FORM 250

Interagency Report Control No. [illegible]

ANNUAL REPORT ON FEDERAL ADVISORY COMMITTEES SUMMARY SHEET

1. DEPARTMENT OR AGENCY
HEW/OE

2. CALENDAR YEAR
1976

NAME OF ADVISORY COMMITTEE	COMMITTEE STATUS DURING THIS CY					ESTABLISHMENT AUTHORITY				COMMITTEE TYPE			TOTAL NUMBER REPORTS	MEETINGS a. Total open	b. Total closed	c. Total partially closed	PERSON YEARS Federal Staff Support Current year	Next year	COSTS Total Annual Cost Current Year (Whole Dollars)	Total Annual Cost Next Year (Whole Dollars)	TOTAL NUMBER OF MEMBERS
	SF 248 Block 4					SF 248 Block 5				SF 248 Block 6			SF 248 Block 13	SF 248 Block 14			SF 248 Block 15a		SF 248 Block 15b		SF 248 Block 9
~~National Advisory Council on Education Professions Development~~					X	~~X~~					X	X	4	3	0	0	4 2/4	0	186,250	0	10
National Advisory Council on Equality of Educational Opportunity		X				X					X	X	1	5 9	0 0	0 0	3 2/4	4 2/4	179,000	185,000	14
National Advisory Council on Ethnic Heritage Studies		X				X					X		1	18 3	0 0	0 0	3/4	1	31,000	40,000	10
National Advisory Council on Extension and Continuing Education		X				X					X	X	1	16 15	0 0	0 0	6 2/4	6 2/4	325,931	263,365	18
National Advisory Council on Indian Education		X				X					X	X	1	2 4	1 4	[illegible] 2	4 2/4	4 2/4	265,778	246,652	15
National Advisory Council on the Education of Disadvantaged Children		X				X					X	X	2	12 12	0	1 1	8 2/4	8 2/4	281,825	281,505	10
National Advisory Council on Vocational Education		X				X					X	X	9	2 10	0 0	1 0	12 2/4	12 2/4	437,965	437,410	21
National Advisory Council on Women's Educational Programs		X				X					X	X	1	29 32	0 0	1 0	6	6 3/4	318,712	316,588	20
~~National Council on Quality in Education~~				X		X					X	X	0	0	0	0	0	0	0	0	0
		16		2	1	18		1			29	9	33	152	4	4	72 2/4	69 1/4	3,267,800	3,270,082	243

(See instructions on reverse)

STANDARD FORM 250 (Rev. 6-75)

Mr. **Eyre**. Mr. Chairman, along that line, I would like to commend the Office of Education in this particular area on budgeting for 1979. For the first time, and I believe I am the oldest executive director here in terms of tenure—for the first time in my eight years I have seen a zero base budgeting planning process implemented by the councils in concert with the Office of Education, DHEW.

It was an excellent exercise and an exercise that would help answer the question that you directed at Dr. Alford.

It was a maximum budget, a hold-the-line budget, a 20-percent-reduction budget, and it was on an object classification basis with a narrative for every expenditure justified. It is a new step in budgeting for at least presidential councils.

Dr. **Alford**. I think that is a good point. We cannot really give you the figures based on that. That is the 1979 budget operation.

Next year this time if we were answering the question, we could utilize that and hopefully give you a better rationale.

Mr. **Kildee**. Dr. Alford, the Office of Education in 1974 changed the manner in which the employees of presidentially-appointed advisory councils were classifed by deeming them to be employees of the United States Office of Education. Could you explain to us why the Office of Education felt it necessary to take this step?

Do you believe it has led to these advisory councils being less independent?

Dr. **Alford**. Well, my memory of this was, it was related to the requirements of classifications of Civil Service.

Ann Bailey I think needs to respond to this. It is a very technical question.

Ms. **Bailey**. It was related to a decision of the Comptroller General from GAO, in which we were informed that the staff of the presidential advisory councils were in fact Federal employees in the excepted Civil Service sense. We had not realized that before. It was an error on the part of OE. So at that point we took steps to correct that misunderstanding and everyone was taken into Federal service, but not as an employee of HEW or OE. The staff are employees of the councils in the excepted Federal service.

Mr. **Kildee**. Thank you very much.

I will yield back to Mr. Buchanan now.

Mr. **Buchanan**. Thank you, Mr. Chairman.

Several councils have overseas programs that are only part of a wider policy issue. For example, both Title I and ESEA provide compensatory education. In addition both Title I and bilingual education cover bilingual education.

In these cases, do these councils work together?

Mr. **Lehmann**. In my tenure on the Bilingual Advisory Council we have initiated contact with several other, let's say, related agencies, but to my knowledge not with Title I.

Ms. **Lovenheim**. His staff people have come over to our office.

Mr. **Buchanan**. There has been communication on the staff level?

Ms. **Lovenheim**. Very often.

Mr. **Buchanan**. Very good. That happens around here, too.

I do not know whether you have any feeling, Mr. Meyer, about where you ought to be placed, if anywhere; I mean, assuming there is a grouping. I assume you hope not to be grouped. I expect that would be true of all of you.

Do you have any feeling on that?

Mr. **Meyer**. There is a difference here between program and concept, I think. I think that the proposed grouping with bilingual was kind of a programmatic kind of grouping, if I understand what is transpiring.

To go beyond that, we regard career education as a concept which should be infused within many, many different areas. As an example, adult education, women's, all those areas have to have some kind of a—career education should be permeating all of those areas in our opinion.

We feel that education for life, education for preparation in life and this whole process of the school system is really a career education kind of approach to education.

We often talk about career education in many ways, that preparation for one's life is really the whole process of schools—the learning to read, write, arithmetic and the basics and everything ultimtely leads us to preparation for life, the career and those things that relate to it.

Yes, we do have—it is important to us when we talk about vocational education, that we understand that vocational education is a programmatic kind of thing and that career education has a broad umbrella concept, but if there were to be some kind of consolidation, it seems that it would be more logical in an area of that nature and perhaps there is different terminology that should be used in the education and work aspect of it. Perhaps to make it a broader concept as opposed to the narrow aspect of it.

We think it is an umbrella structure, Congressman, and should be treated as such.

Mr. **Buchanan**. I would think so.

I understand several of the councils have no personnel cost because of the services provided by the Program Office. I wonder if someone could comment on whether these councils are thereby less effective or whether this is a workable arrangement?

Mr. **Essex**. The Community Education Advisory Council functions in the context which you have just described. We have not suffered because of the mutuality of interest. We represent a wide spectrum geographically, as well as ethnically, and from the perspective of experience. Hence it has been adequately served because we started from the very beginning with personnel meeting with them. I could not speak for the other councils.

I might mention, however, in passing, something about your prior question and the response to it. The chairmen of the several councils have been meeting, discussing their programs, and how they might function more effectively, cooperatively.

Mr. **Buchanan**. Very good. We are very proud of what is happening in community education in my city.

Mr. Alford, do you have a comment on the pattern of personnel costs—I mean, what is forthcoming from the Program Office? From an Office of Education standpoint, how do you view that arrangement?

Dr. **Alford**. I don't think it is a question of whether it is effective——

Mr. **Buchanan**. From the standpoint of the Office of Education, if there are budget considerations in the groupings of these councils, I wonder if you think it is a good arrangement for this to be handled in this way? For example, as in the case of community education?

Dr. **Alford**. I guess there are pros and cons. As was mentioned earlier, it may give the impression of a little closer tie to the bureaucracy and the Office when the support comes in this way through using Office of Education staff, but since Dr. Essex has indicated he finds it very satisfactory in his particular committee, I think probably the proof of the pudding is in the eating and how it works in this case.

I don't know that we have any strong feelings. Once again, let me turn to Ms. Bailey.

Ms. **Bailey**. I have no comment.

Dr. **Lewis**. Mr. Buchanan, I might be able to give you an illustration of a problem which the National Advisory Council on the Education of Disadvantaged Children had to address in which we learned that the kind of staffing arrangement we had was extremely important, and that deals with the independence of the council.

You are aware of an expenditure of some $15 million for a study done by the National Institute of Education which I understand is about in its final stages at this point. Our council was brought into the advisory capacity in connection with that study. We did at no time take exception to the need for the study, but we did find it necessary, during the development of study methodology and this sort of thing, to take exceptions to a number of the directions that were determined by the National Institute of Education. Had we been tied to the Office of Education in the manner you refer to it would have been a very difficult and delicate issue for Office of Education staff to deal with in view of the interagency nature of the question and I believe our opportunity to offer an independent judgment in an area we thought was extremely important in connection with that study would have been severely hampered.

You have in the materials the committee has forwarded to you a copy of a report which our council carried out in which we did use some private consulting assistance which relates to our views at that point on the study done by NIE and I would invite your attention to that particular document as an illustration of a position we took that would have been very difficult in that kind of a staff position.

Mr. **Essex**. I have a feeling, having lived in bureaucracy so much of my life, that it may vary with the size of the operation, when one views adult education or views Title I or views vocational education.

I suspect the vastness of it may give direction toward autonomy and independence, but again these are difficult questions to answer. They depend a great deal upon the issues and the personnel with whom one is associated.

But I think your question is a very pertinent one. I would not be disturbed to see them remain mixed and then be reviewed periodically by the Congress.

Mrs. **Simonson**. From the perspective of our council it is very important to have the independence we have under the present structure, partly because of the point that was just made that we advise about not just one program and not just the Commissioner of Education, but also the Assistant Secretary and the various components under her and also through her education programs in other departments. It would not be appropriate for any one small office that administers the Women's Education Equity Act to staff our council, but in addition to that the independent status that we have gives our council members much more feeling that they not only should, but are in a position to, offer advice which may be rather critical, and which might not be so readily possible if our staff were directly in the Office of Education or worked as part of other component of the Education Division.

I think the reports that will be reaching you from us on the different aspects of the Education Division, its personnel practices regarding women and its programmatic activities concerning women will really illustrate that point.

Dr. **ALFORD.** It comes to me that in the case of the Presidential Advisory Commission—and I think you have made some distinctions in the legislation—that clearly those are best handled by separate funding and staffing. I think it has been brought out in comments here, and it is true in the case of almost all of them, they do go beyond the Office of Education.

In the case of the disadvantaged, they are looking at all disadvantaged programs and in the case of women's educational equity they are looking broader than just at the Office of Education.

I think it becomes valuable in the cases that the source of advice be clear of any inputs we might have on the outcome of their deliberations.

In the others, for example, Secretarial appointments or Commissioner appointments, it may not be as critical in those cases, though, once again, the argument might be raised either way as to how much independence you want to create in those instances.

Mr. **BUCHANAN.** Thank you.

Mr. **JENNINGS.** With regard to the GAO report, the GAO report seemed to say in evaluating whether an advisory council should continue, the Congress was advised by GAO to use four criteria and they are listed as the number of committee meetings, the degree of support costs from the agency, the age of the Council and the number of reports and recommendations made and adopted by the councils. Would the panel agree that those should be the four criteria Congress should be looking at when they consider the administration's recommendations in the fall?

Mrs. **AWSUMB.** I cannot think of any to add to it. I think the criteria they have listed are valid criteria by which to judge the accomplishments of the council. There is an area of effectiveness that seems to be not directly addressed in those four criteria, but how you address the effectiveness I don't know. You can always write a good report, you know, and make it look like it was effective, but the judgments of the actual effectiveness are hard to come by.

That is one of the reasons our council sought to evaluate the evaluations of the Office of Education when they were looking at the program. We felt this was a valid look at the effectiveness; a sort of checkbalance.

Mr. **Meyer**. I think the criteria is good. One question I would have would be the period of time during which that evaluation would take place. If it is on a yearly basis, you might find specific councils have an emphasis on one particular area in a particular year and a different area in another year, which does happen, so I would think if you are talking about evaluating councils, you ought to do it over a two or three-year period, and then look at those criteria you established in terms of that kind of period of time and not just a one-year period.

Ms. **Simonson**. In addition to the listed criteria, which certainly appear sound, it might be useful to look at the degree of participation by the council members. I don't know that this is presently true of any council, but if a council had only a small proportion of its members who were active and attending meetings or working on reports, studies and so on, that would probably be a black mark against it.

Conversely, I would suggest it might be well to add a look at the degree of citizen participation from the outside of the council. I have heard that many councils like our own have public hearings. There should be some form of outreach, whether it is hearings or not. Then the council should utilize the background information it collects that way. That gives a multiplier effect to the council which I think would be a plus.

Perhaps it would be difficult, but I think a look at the extent to which the recommendations in the reports, in the communications from the council, were accepted, or the reasons why not. In other words, the council might make ten excellent recommendations but if only one or two of them were accepted, it would not necesarily be the council's fault. But at least a look at how many of their recommendations are accepted, and why others are not, would give some additional measure of the effectiveness of the particular council.

Dr. **Lewis**. I won't duplicate any of the comments of others who have addressed this issue for purposes of time although I would endorse those in particular, the comments Ms. Simonson makes with regard to what happens to the recommendations of the Council.

I would suggest our council would not at all disagree with the use of the criteria suggested by GAO. There are, however, a couple of additional considerations that I think might be important to consider in this process.

As a specific illustration, in connection with Title I as it operates today in the country, figures are not clear, but it is relatively certain that the number of students in need who are served falls somewhere between about a third and a half. This creates some serious questions of priority that have caused the development of regulations that would be unnecessary, I believe, and I think counsel would agree with this, if we had enough money or a plan to serve all of the students in need. I think that makes the evaluation of our council's importance a unique consideration at this time and I would react differently in terms of the needs of a council such as NAEC if we were at this time able to serve all the students, but I think until we are there is a need for input through this kind of a vehicle.

Second, I would draw your attention to the comments of Senator Metcalf in the July 13, 1977 Congressional Record in which he identified some of the possible alternatives should it be determined by any process of evaluation that certain councils were no longer to exist, to be combined or what-have-you. His words are as follows:

> To stress numbers apart from evaluation, could it expire expedient mergers and invite the use of informal or unofficial panels that do everything chartered advisory committees do but are neither counted nor accountable as such. It might also encourage resort to oversize catchall committees with endless subcommittees. The visible committee tip would not hint at the invisible mass below.

I think that is an extremely important consideration in this evaluation process because something else will come after.

Mr. **Essex**. I will pass.

Dr. **Alford**. I don't think you want my response.

Mr. **Lehmann**. I agree. Again, in the case of Bilingual Education, however, you need consideration for the languge capability in terms of the composition of the Council and how this comes into play, the total responsibilities should be a variable.

Dr. **Eyre**. I think we should add for your consideration perhaps three other areas. I think before a secretarial, presidential or commissioner's council is established that one must identify—the United States Congress must identify the national educational priorities for this country and once that is done then do we need outside advice and a national advisory council on a particular issue against the priorities established for the federal role in American education. That would be a criteria for evaluating having or maintaining a council. Does it in fact meet a mandated responsibiity, an issue or concern in American education? Fifty-four million adult citizens your age do not have a high school diploma. That is a national issue. Once that is addressed, then we need a national advisory council or some mechanism for getting at that. Once that is established, Mr. Jennings, I think those people in that target population must identify the compelling need for that council. Let it come from the grass roots level, to see if they in fact need that kind of mechanism. I would add that to the GAO.

The last one I think, in terms of representation on that advisory body, is the proper distribution geographically of the location of those members so that every part of America in the case of the Advisory Council for adult education does have an individual who can serve as a catalytic agent within that particular area.

I don't care if you assign it to the ten regions of HEW if you want the President to appoint them that way, with five areas or what, but I think that is another evaluative criteria and I would certainly support the one that was mentioned here, to ascertain the implementation of the recommendations rendered by each of the councils. What have been the results, as a criteria for measuring those councils?

Thank you.

Dr. **Relic**. Mr. Jennings, I would add only a reiteration of what has been said by several people, and that would be that one of the criterion should be a qualitative measure of performance and although this could be an elusive, subjective category, perhaps it can be objectified by such examples as have already been given, such as the recommendations in the agency response—that is, the agency outcomes on the basis of the recommendations of the council; the ranking of priorities and the rationale by the council for its activities, and perhaps include also an agency evaluation responsibility of the Director on the Council's impact on the agency and its policies and performance.

Mr. **Thompson**. Mr. Jennings, I would just add a couple of thoughts. I think that our council basically agrees with the four criteria, but I think that in light of the specially drastic reduction from '76 to '77 in our specific budget there seems to be an extreme dichotomy of thinking in the decisions that were made.

On one hand our council is extremely functional and, on the other hand, we received a 56 percent reduction in funds. I guess what I am getting at is that when one normally evaluates something you tend to evaluate it in terms of what it is supposed to do and I think that for our council two points that might have been added in terms of our evaluation for us specifically would have been the matter of proposal review and also the personnel issue, the terms of the selection of a state of candidates for the Office of Deputy Commissioner. So I feel that although those four are generally valid that possibly a specific review of the objectives of each council might be an equally valid way to judge the effectiveness of the specific councils.

Thank you.

Ms. **Mongiardo**. I am not personally familiar with the criteria to any in-depth level and I would prefer to ask you to let Dr. Femminella respond if you so desire since I am not a member of that council.

Mr. **Jennings**. Mr. Kildee, could I suggest the witnesses submit some data for the record—the reason I say this is because it doesn't seem to be uniformly presented in their statements. It would be data on the amount of salaries spent for each one of the advisory councils for '76 and '77 and also data on the amount spent for travel by staff and the amount spent for travel by members of the advisory councils and finally the per diem or compensation paid to members of advisory councils.

Mr. **Kildee**. The chair would request that be sent to the committee.

[The information requested is contained at the end of this days proceedings.]

Mr. **Cross**. Mr. Chairman, I have but two questions. One to Mrs. Awsumb. As you know, we had three days of hearings on the Emergency School Aid act in this committee about a month ago. One of the problems that we have in dealing with any program is timing, having information available to us in a timely manner so that it will really be helpful to us.

Our hearings concluded on a Thursday and on Friday morning the latest report of the National Advisory Council on Emergency School Aid programs appeared on my desk and I assume on everyone else's.

I felt there were very good recommendations in there we should have asked questions about but I am concerned about why that didn't arrive until after those hearings were over. I wonder if there is any particular reason for that and if the fact the hearings were being held was a factor in terms of producing that report.

Mrs. **Awsumb**. I would like to defer the answer to that question to Mr. Leo Lorenzo, who is the Executive Director of our council.

Mr. **Lorenzo**. We sent the report to members of the committee in March, March 29th, and we did it again at that particular time because that was the bound volume we received from the printer. At the time we received it, it was sent to every member of the committee.

Mr. **Cross**. Then the bound volume did not get back until that time?

Mr. **Lorenzo**. That is correct.

Mr. **Cross**. I guess the zero-based budgeting question for councils is, would the services to children really be affected if the council was not there. That may be a question you don't want to answer off the top of your head, but perhaps we could have an answer for the record on that.

Are the councils really providing something that challenges and has an effect on the direct service to children or to adults, whoever the recipient might be?

Mr. **Cross**. Ms. Simonson, one of the questions we had within the Women's program about a month ago was the number of studies for which the council has contracted. Aren't some of those studies really better done by grantees of the program? How do you make the determination on what studies you contract for and what grants the program awards?

Ms. **Simonson**. The program gives awards for grants for activities which can be replicated and used around the country, hopefully to actually combat sex bias in education. They are in such fields as preparation of materials for training of educators; programs which can help women advance into positions of educational leadership enter nontraditional careers, and so on.

The studies which the Advisory Council has contracted for in the first place involve small sums of money under which grant programs could not be expected to develop materials or activities for replication, dissemination and so on, which I just mentioned. Our studies are meant to shed some light on problems which we believe will need corrective action or additional work by Federal programs. Our best example would be the study on educational needs of rural women and girls. We suspected, and our research proved, that there has been remarkably little attention paid to the special problems that rural women and girls face in education. We didn't set out to develop or devise any program or project or activity which would solve these problems. We held four regional hearings and issued a report, which I referred to earlier, in order to call attention of both Federal and State and local people to the problem.

We hope that there will be not only some grants in this field under the Women's Educational Equity Act as there have been already—and we hope for more—but also activities by other agencies such as, for example, the Extension Service of the Department of Agriculture, and the land-grant colleges and so on to meet the problems which our report uncovered. But the reort itself was not intended to be a prototype for any operating activity.

Similarly with our other reports, such as the reviews of HEW, we are not, obviously, undertaking action to correct these problems, but we hope that our reports will highlight the needs and we will then be watching to see what action is taken.

Mr. **Cross**. You plan other reports in the future?

Ms. **Simonson**. Yes, we have a few that we are planning.

Mr. **Cross**. Thank you, Mr. Chairman.

Mr. **Kildee**. Thank you.

Mrs. Awsumb, by letter we will be asking for budgets with regard to the Emergency School Aid Council, with regard to consultants and other members. That letter will be coming soon, more specific questions on your budget regarding consultant fees and travel allowances.

Mrs. **Awsumb**. Yes.

Mr. **Kildee**. You will do that by letter when you respond, and it will be made a part of the record.

Mrs. **Awsumb**. We will respond.

Mr. **Kildee**. Thank you very much.

I wanted to thank Dr Alford and members of the panel. I have been to a number of hearings this year and this is by far one of the better hearings. As a former teacher, I would give you an A.

We will stand adjourned after we hear from Mr. Buchanan.

Mr. **Buchanan**. I want to make one additional point.

Take heart, all of you. The President proposes but the Congress disposes.

Mr. **Essex**. May I say, having had this experience previously on various occasions, you have conducted a masterful meeting today and we appreciate it.

Mr. **Kildee**. Thank you very much.

[Whereupon, at 12:05 p.m., the subcommittee adjourned.]

[Additional material submitted for the record follows:]

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August 11, 1977

TO: Witnesses for National Advisory Councils at the Subcommittee Hearing on August 4th

FROM: Carl D. Perkins, Chairman

RE: Additional Information for the Hearing Record on National Advisory Councils

During the course of the Subcommittee's hearing on August 4th on national advisory councils, there were several matters which the Members of the Subcommittee were unable to pursue due to constraints of time but which I feel would contribute to our hearing record.

Therefore, I would appreciate your responding to the following questions as they pertain to your advisory council for insertion in the hearing record. Data from both fiscal year 1976 and 1977 would be the most useful. Because we wish to have this hearing printed as quickly as possible, I would need to receive your response by August 19th.

(1) What is the total amount of salaries, including all benefits, paid to council members for meetings, site visits, other work assignments, etc.?

(2) (For Presidential Advisory Councils only) What is the total amount of salaries, including benefits, paid to council staff? Could you break down this amount further according to permanent, temporary, or consultant staff expenditures?

(3) What is the total amount expended for travel by council members, including transportation, per diem, and miscellaneous expenses? If possible, I would like this to be broken down further into travel for meetings, for site visits, and other travel.

(4) What are the total funds expended for travel by all staff, including transportation, per diem, and miscellaneous expenses? If possible, I would like this to be broken down as in question (3). (For Secretarial Councils, responses should include expenses for Office of Education staff travel in support of council activities.)

(5) Could you also provide a list of all contracts let within the past two years, including the names of the contractors, the total amount of each contract, the purpose of the contract, the delivery date for current contracts, and whether the contract was bid competitively? This list should include studies, papers, evaluations, and other program services performed for the council, but should not include purchases of equipment, repair contracts, and so forth.

I hope you will feel free to include for the record any additional views or comments you may have concerning the Federal Advisory Councils Act or the General Education Provisions Act. Any suggestions you may have for improving these Acts, as well as the information I have requested, will be given the utmost consideration by the Subcommittee when we consider education legislation next year.

Thank you for your cooperation.

NATIONAL ADVISORY COUNCIL ON INDIAN EDUCATION

MEMORANDUM

August 17, 1977

TO: The Honorable Carl D. Perkins, Chairman
House Committee on Education and Labor
Subcommittee on Elementary, Secondary, and Vocational Education

FROM: Thomas A. Thompson, Chairman T.A.T.

SUBJECT: Additional Information for the Hearing Record on National Advisory Councils

On August 4, 1977, Mr. Thomas A. Thompson, Chairman, presented testimony before the House Committee on Education and Labor; Subcommittee on Elementary, Secondary, and Vocational Education. On August 11, 1977, the Honorable Carl D. Perkins requested additional information for the Hearing Record on National Advisory Councils. The following represents the same:

(1) What is the total amount of salaries, including all benefits, paid to council members for meetings, site visits, and other work assignments?

	FY'76	TRANSITION QUARTER	TOTAL	FY'77
Full Council	21,700.00	4,800.00	26,500.00	22,600.00
Benefits	1,269.45	280.80	1,550.25	1,322.10
Subcommittee	9,100.00	800.00	9,900.00	-0-
Benefits	532.35	46.80	579.15	-0-
On-Site, Visits	9,400.00	4,100.00	13,500.00	-0-
Benefits	549.90	239.85	789.75	-0-
Other Business	1,800.00	-0-	1,800.00	300.00
Benefits	105.30	-0-	105.30	17.55
TOTAL	44,457.00	10,267.45	54,724.45	24,239.65

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(2) What is the total amount of salaries, including benefits, paid to council staff?

	FY'76	TRANSITION QUARTER	TOTAL	FY'77
PERMANENT				
Executive Director	33,157.60	9,303.04	42,460.64	44,422.00
Assoc. Exec. Dir.	24,094.00	6,609.92	30,703.92	5,039.00 *
Admin. Assistant	6,718.40	2,659.22	9,377.62	11,607.00
Sten/Receptionist	5,811.12	2,344.96	8,156.08	10,483.00
Overtime	848.26	127.52	975.78	429.99
Benefits	6,350.08	1,903.46	8,253.54	6,797.36
Subtotal	76,979.46	22,948.12	99,927.58	78,778.35
TEMPORARY				
Student Aid	780.00	-0-	780.00	-0-
Benefits	45.63	-0-	45.63	-0-
Subtotal	825.63	-0-	825.63	-0-
CONSULTANTS				
Compensation	20,904.72	-0-	20,904.72	1,000.00
Benefits	1,222.93	-0-	1,222.93	58.50
Subtotal	22,127.65	-0-	22,127.65	1,058.50
TOTAL	99,932.74	22,948.12	122,880.86	79,836.85

(3) What is the total amount expended for travel by council members, including transportation, per diem, and miscellaneous expenses?

	FY'76	TRANSITION QUARTER	TOTAL	FY'77
Full Council	23,723.75	8,408.66	32,132.41	7,592.59
Subcommittee	13,738.64	612.65	14,351.29	-0-
On-Site, Visits	5,942.34	7,322.25	13,264.59	-0-
Other Business	1,753.91	-0-	1,753.91	564.00
TOTAL	45,158.64	16,343.56	61,502.20	8,156.59

(4) What are the total funds expended for travel by all staff, including transportation, per diem, and miscellaneous expenses?

	FY'76	TRANSITION QUARTER	TOTAL	FY'77
Full Council	2,940.26	768.65	3,708.91	-0-
Subcommittee	2,898.81	788.15	3,686.96	330.19
On-Site, Visits	2,340.99	1,526.99	3,867.98	268.00
Other Business	2,224.12	-0-	2,224.12	-0-
Subtotal	10,404.18	3,083.79	13,487.97	598.19

(4) Cont.

	FY'76	TRANSITION QUARTER	TOTAL	FY'77
Invitational Travel	979.06	528.65	1,507.71	-0-
Taxi (local travel)	896.01	264.20	1,160.21	651.45
TOTAL	12,279.25	3,876.64	16,155.89	1,249.64

(5) Could you also provide a list of all contracts let within the past two years, including the names of the contractors, the total amount of each contract, the purpose of the contract, the delivery date for current contracts, and whether the contract was bid competitively?

The National Advisory Council on Indian Education entered into one contract during the above specified time period. The said contract was not bid competitively by the Council. The contract was a follow-up to an earlier contract between the USOE/BIA and ACKCO Incorporated. For more specific information see the attachment.

STANDARD FORM 147, JUNE 1964—FED. PROC. REG. (41 CFR) 1-3.605

ORDER FOR SUPPLI[illegible]R SERVICES

ISSUING OFFICE
U.S. Office of Education
Grant & Procurement Management DivI
400 Maryland Avenue S.W.
Washington, D.C. 20202

MARK ALL PACKAGES AND PAPERS WITH ORDER AND/OR CONTRACT NUMBERS

PAGE 1 OF 1

DATE OF ORDER: 11-18-75
CONTRACT NO. (If any):
ORDER NO.: P00760076

ACCOUNTING AND APPROPRIATION DATA
APPN: 7560.204
CAN: 6200 0455
O.C. 25.22

REQUISITIONING OFFICE:

REQUISITION NO./PURCHASE AUTHORITY: GPR 11-3-75

CONTRACTOR (Name and address, including ZIP code)
TO→
ACKCO Incorporated
250 Arapahoe, Suite 206
Boulder, Colorado
Entity# 1-460316645-A1

SHIP TO (Consignee and address, including ZIP code)
National Advisory Council on
Indian Education
425 13th Street, N.W. Suite 326
Washington, D.C. 20004

VIA

TYPE OF ORDER
PURCHASE ☒ REFERENCE YOUR
PLEASE FURNISH THE FOLLOWING ON THE TERMS SPECIFIED ON BOTH SIDES OF THIS ORDER AND ON THE ATTACHED SHEETS, IF ANY, INCLUDING DELIVERY AS INDICATED. THIS PURCHASE IS NEGOTIATED UNDER AUTHORITY OF 41 USC (c) (3)
DELIVERY ☐ EXCEPT FOR THE BILLING INSTRUCTIONS ON THE REVERSE, THIS DELIVERY ORDER IS SUBJECT TO INSTRUCTIONS CONTAINED ON THIS SIDE ONLY OF THIS FORM AND IS ISSUED SUBJECT TO THE TERMS AND CONDITIONS OF THE ABOVE NUMBERED CONTRACT.

F.O.B. POINT: Washington, D.C.
GOVERNMENT B/L NO.:
DELIVERY TO F.O.B. POINT ON OR BEFORE:
DISCOUNT TERMS:

SCHEDULE

ITEM NO.	SUPPLIES OR SERVICES	QUANTITY ORDERED	UNIT	UNIT PRICE	AMOUNT	QUANTITY ACCEPTED
	Conduct a workshop on the USOE/BIA Study of the impact of Federal funds on Local Edueation Agencies enrolling Indian children on November 5, 1975. The workshop is to review the findings of the USOE/BIA Study and explain in detail the conclusions and recommendations made in the report on the study "So that all Indian children will have Equal Education Opportunity". The workshop is to highlight: The Background and Purpose of the Study The Conduct of the Study The Outcome of the Study Finding, Conclusions and Recommendations Plans for Further Study and Action Contractor will deliver the summary of the study consisting of 35 pages and 100 copies. All costs for salaries, typing, materials, 3 trips from Boulder, Colorado to Oklahoma City, Oklahoma and return, postage and related expenses necessary to complete the work described above are included in the lump ~~sum~~ price of $1,009.70. Ownership of the summary rests with the Council.					

SIZE CLASSIFICATION (Check one) ☐ SMALL BUSINESS ☐ OTHER THAN SMALL BUSINESS

TOTAL FROM CONTINUATION PAGES:

SEE BILLING INSTRUCTIONS ON REVERSE

SHIPPING POINT:
GROSS SHIPPING WEIGHT:
INVOICE NO.:

GRAND TOTAL → $1,009.70

Use reverse for payment

MAIL INVOICE TO:
U.S.Office of Education
Grant & Procurement Mgt. Div
400 Maryland Avenue S.W. Washington D.C.
Attn: E.T.Peterson

UNITED STATES OF AMERICA
BY E.T. Peterson (Signature)
NAME (Typed) E.T. PETERSON
TITLE CONTRACTING OFFICER

STANDARD FORM 147, JUNE 1964
*Include ZIP code
147-105

ADDITIONAL INFORMATION ON ADVISORY COUNCIL ON EDUCATION STATISTICS

National Center for Education Statistics

1. Members of ACES are paid $100 per day of meeting. There are no other payments or benefits. In FY 1976, the total amount paid to the members was $4,600. In FY 1977, the total amount paid was $4,200. (An earlier report on FY 1977 expenditures included a planned September, 1977 meeting; scheduling difficulties moved this meeting to October and FY 1978, thus reducing the expenditures for honoraria from $5,600 to $4,200 in FY 1977.)

2. ACES is not a Presidental Advisory Council. It was established by P.L. 93-380, and is advisory to the Secretary of HEW and submits an annual report to the Congress.

3. The total amounts spent for member travel is shown below. Members did no travel except for travel to meetings in Washington.

	FY 1976	FY 1977
Air Fare	$ 4,475	$ 4,265
Per Diem	1,840	1,500
Other	574	500
Total	$ 6,889	$ 6,265*

*An earlier report on FY 1977 expenditures included $ 3310 for a planned September, 1977, meeting, for a total of $ 9575. Scheduling difficulties moved this meeting to October, 1977, or FY 1978.

4. There were no expenses for staff travel in connection with Advisory Council business.

5. The Advisory Council has no contracts and there was no contractual work done at their direction or on their behalf.

TESTIMONY OF FRANCIS X. FEMMINELLA, CHAIRMAN, NATIONAL ADVISORY COUNCIL ON ETHNIC HERITAGE STUDIES TO THE SUBCOMMITTEE ON ELEMENTARY, SECONDARY, AND VOCATIONAL EDUCATION

ADDITIONAL INFORMATION FOR THE HEARING RECORD ON NATIONAL ADVISORY COUNCILS

Q1. What is the total amount of salaries, including all benefits paid to Council members for meetings, site visits, other work assignments, etc.?

A.	FY 1976	Transition Quarter	FY 1977
	$6,500	$2,300	$6,400

Council members have been making site visits near their official duty stations at no cost to the Government.

Q2. Not applicable.

Q3. What is the total amount expended for travel by Council members, including transportation, per diem, and miscellaneous expenses?

A.	FY 1976	Transition Quarter	FY 1977
	$14,212	$2,330	$8,200

Q4. What are the total funds expended for travel by all staff, including transportation, per diem, and miscellaneous expenses?

A. Travel by Office of Education staff is not paid out of the National Advisory Council funds, but out of S&E budget.

Q5. Could you provide a list of all contracts let within the past two years, including the names, etc.?

A. The National Advisory Council on Ethnic Heritage Studies has not let any contracts.

6. Additional Comments

It is my strong recommendation that the National Advisory Council on Ethnic Heritage Studies should not be merged in the manner being suggested by the Office of Education, which is demonstrating its traditional lack of sensitivity to ethnicity in the United States. Ethnics are systematically denied a voice in education due to educational philosophies which erroneously equate Americanism and homogenization. For this reason, the one small contact that does exist, the National Advisory Council on Ethnic Heritage Studies, is very much needed.

If, in spite of this, the Council must be merged, then it ought to be merged with other councils that are in some way concerned with ethnicity and a multi-cultural, multi-ethnic society, such as the National Advisory Councils on Indian Education, on Bilingual Education, on Black Higher Education, and possibly on Equality of Educational Opportunity. Such a council might be called a Council on Ethnicity and Education, or a Council on American Studies.

I believe that continuing, indeed strengthening, the Council will be good, not for just a few, but for all the people, because in the United States _all_ citizens have both a domestic and an alien heritage. On the one hand, citizens who were born in foreign countries and their children and all their progeny have a right to participate in the heritage of our Nation and the revolution whose bicentennial we are still celebrating. The progeny of those immigrants who came here hundreds of years ago and of the autochthonous people of North America, on the other hand, have a right to learn about the alien cultures and societies of their ancestors. The Ethnic Heritage Studies Act contributes toward achievement of both these goals. As the schools move toward teaching the values of cultural democracy, Americanism will come to be understood as implying unity with heterogeneity.

In the presence of a weakened, merged, or eliminated advisory council on ethnic heritage studies, we can expect the Office of Education to de-emphasize, minimize and eventually retrench the ethnic heritage studies program. I believe this to be detrimental to ethnic and racial harmony and tragic for the unity of the Nation.

Francis X. Femminella

August 18, 1977

NACAE
NATIONAL ADVISORY COUNCIL on ADULT EDUCATION

August 18, 1977

The Honorable Carl D. Perkins
Chairman
Subcommittee on Elementary, Secondary
and Vocational Education
House of Representatives
B-346C Rayburn House Office Building
Washington, D. C. 20515

Dear Mr. Perkins:

The following information is furnished in accordance with your letter of August 11 concerning the Subcommittee's hearing on August 4 on national advisory councils. The information is furnished for FY-76, the transition quarter, and estimated expenditures for FY-77.

1. Total salaries, including all benefits, to Council members (15) for meetings, site visitations, and other work assignments:

	FY-76	TQ	FY-77
Salaries	$36,100.00	$ 9,500.00	$30,300.00
Benefits	2,111.85	555.75	1,772.55
Total	$38,211.85	$10,055.75	$32,072.55

2. Total salaries, including benefits, paid to Council staff:

Permanent	$116,360.61	$32,041.33	$131,664.95
Temporary	295.79	-0-	4,924.99
Consultant	-0-	9,256.58	3,598.90
Total	$116,656.40	$41,297.91	$140,188.84

Benefits for permanent staff include health plans, federal retirement, and life insurance. Temporary personnel and consultants receive social security benefits (FICA).

425 13th STREET, N.W./PENNSYLVANIA BLDG. SUITE 323 WASHINGTON, D.C. 20004 (202) 376-8892

3. Amount expended for travel by Council members (15), including transportation, per diem, and miscellaneous travel expenses:

	FY-76	TQ	FY-77
Meetings (Full Council & Committees)	$32,694.72	$ 6,497.66	$24,995.31
Site Visitations	3,090.33	1,047.22	5,178.70
Other	4,429.60	1,768.21	3,884.40
Total	$40,214.65	$ 9,313.09	$34,058.41

The category of "other" expenses includes travel for Council members attending a series of legislative meetings across the United States for the purpose of developing legislative recommendations for amending the Adult Education Act. (Refer to page 11 of the Council's 1977 Section I Report.) Other expenses were also incurred for meetings with the Council's Executive Director, and for travel expenses associated with the development of the Council's special reports.

4. Amount expended for travel by staff, including transportation, per diem, and miscellaneous travel expenses:

Council Meetings & Committee Meetings	$ 6,051.35	$ 808.25	$ 5,002.36
Conference/Workshops	4,121.04	1,050.40	4,422.30
Taxi	1,005.37	272.14	908.46
Special Projects Activities	-0-	3,906.27	7,274.48
Total	$11,177.76	$ 6,037.06	$17,607.60

The Council conducted a state-by-state survey on state legislative activities in partnership with the federal Adult Education Act. The Council's staff also attended the futures and amendments meetings indicated in the explanation to item #3.

5. Contracts:

FY-76 Mr. John Creighton; $596.00; Sole Source; Delivery Date, May 20, 1976. Purpose: To develop comprehensive Council policy statements through an analysis of legislation, rules and regulations, and minutes of Council meetings.

5. Contracts: (continued)

TQ None Issued.

FY-77 Mr. Alfred Cain; $1,996.00; Sole Source; Delivery Date, April 11, 1977. Purpose: To research, edit, footnote, and modify the original manuscripts of the NACAE Section I Report.

No current contracts.

Participants at the Council's futures and amendments meetings were reimbursed for travel and per diem. No compensation was paid to the futures and amendments participants. For the futures and amendments project, there was a total of $4,407.38 for FY-76, $9,786.78 expended during the transition quarter, and $25,431.04 during FY-77.

The Council-sponsored legislative futures and amendments meetings were held nine times in seven different locations between April 22, 1976, and May 24, 1977. There were 263 representatives in the nine sessions, including 39 times that a Council member and staff individual were present.

To complete the state-by-state survey, the Adult Education Directors from Hawaii and Alaska met with a Council staff member in San Francisco. The expenditure for travel for these two State Directors in FY-77 was $669.79.

Invitational travel was expended for selected personnel to attend Council meetings for the purpose of reporting on specific adult education activities and programs. The expenditure for this invitational travel was $2,202.66 in FY-76, $364.65 in the transition quarter, and $1,309.20 in FY-77.

The Council recommends that the Adult Education Act be amended to instruct the appointment authority (President of the United States) to make Council member appointments on the basis of the ten HEW regions. Example - the President should appoint one Council member from each of the HEW regions and five members serving at large.

The National Advisory Council on Adult Education will have prepared legislative amendments and recommendations as a result of the Council's futures and amendments hearings. These recommendations will be available to your Subcommittee and the U. S. Congress prior to December 1977.

The Council is most appreciative of your support and concern for the target population served by the federal Adult Education Act, and we look forward to a continued supportive relationship with you and your Committee.

Sincerely yours,

ACCrews

Alton C. Crews
Council Chairman

national advisory council on women's educational programs
1832 M St., N.W.
Washington, D.C. 20036
(202) 653-5846

August 17, 1977

The Honorable
Carl D. Perkins, Chairman
House of Representatives
Committee on Education and Labor
Subcommittee on Elementary, Secondary
and Vocational Education
B-346C Rayburn Office Building
Washington, DC 20515

Dear Congressman Perkins:

In response to your letter of August 11, I am enclosing the financial information you requested about the National Advisory Council.

If there are further questions please do not hesitate to call me.

Sincerely,

Kathleen Maurer

Kathleen Maurer
Administrative Officer

encl.

Mary Beth Peters, Pittsburgh, PA, chair
Marguerite Selden, Washington, D.C. vice-chair
Joy R. Simonson, executive director

Mary Allen, Valley Center, KS
Katherine Burgum, Fargo, ND
Anne Campbell, Lincoln, NB
Joanne Carlson, Eugene, OR

Marjorie Bell Chambers, Denver, CO
Agnes I. Chan, San Francisco, CA
Agnes M. Dill, Isleta, NM
Elizabeth Z. Fryer, Brentwood, TN
Jon Fuller, Ann Arbor, MI

Thera C. Johnson, Ogden, UT
Sister Joyce Rowland, Winona, MN
Bernice Sandler, Silver Spring, MD
Theresa Aragon de Shepro, Seattle, WA
Gerald E. Weaver, Columbus, MS

EX OFFICIO MEMBERS
Chairman, U.S. Commission on Civil Rights · Director, Women's Bureau, U.S. Department of Labor · Director, Women's Action Program, U.S. Department of Health, Education and Welfare

NOTE: all dates refer to fiscal years, not calendar years

1. Total salaries paid to Council members, including benefits and payroll charges:

1976 (regular year - 12 months)	$30,896.
1976 (transition quarter - 3 months)	9,893.
1977 (to July 15)	25,553.

2. Total salaries paid to Council staff, including benefits and payroll charges:

1976 (regular year):	permanent staff	$52,761.
	temporary staff	10,404.
	consultants	3,520.
1976 (transition):	permanent staff	$35,570.
	temporary staff	1,279.
	consultants	9,178.
1977 (to July 15):	permanent staff	85,991.
	temporary staff	17,516.
	consultants	1,075.

3. Travel and per diem costs for Council members:

1976 (regular):	meetings	$39,186.
	site visits	---
	other	256.
1976 (transition):	meetings	7,997.
	site visits	---
	other	8.
1977 (to July 15):	meetings	27,197.
	site visits	463.
	other	630.

4. Travel and per diem for Council staff:

1976 (regular):	meetings	4,481.
	site visits	---
	other	867.

4. Travel and per diem for Council staff (continued from previous page):

1976 (transition):	meetings	$ 999.
	site visits	---
	other	446.
1977 (to July 15):	meetings	3,469.
	site visits	615.
	other	1,515.

5. Contracts let by Council 1976 :

o University of Wisconsin Extension - initial research paper on educational needs of rural women and girls.	$2,535.
o Kathryn Clarenbach - planning and conducting of public consultation session on educational needs of rural women and girls; production of report on same; held in Madison, WI.	1,424.
o Betty Bradlyn - planning and conducting of public consultation session on educational needs of rural women and girls; production of report on same; held in Stockton, CA.	1,600.
o Tasia Young - planning and conducting of public consultation session on educational needs of rural women and girls; production of report on same; held in Sante Fe, NM.	1,400.
o Appalachian State University - planning and conducting of public consultation session on educational needs of rural women and girls; providing travel, per diem and salaries for Council members in attendance; production of report on same; held in Boone, NC.	6,250.
o Kathryn Clarenbach- final report on educational needs of rural women and girls compiled from information gathered through all of above.	2,000.
o Kathryn Clarenbach- representation of Council at conferences and hearings related to educational needs of rural women and girls; includes travel and salary.	1,500.
o Steiger, Fink and Kosecoff - research and writing of report on how women participate in management and policy development in Education Division of HEW; part of Council's several volume report on Education Division.	9,975.
o Steiger, Fink and Kosecoff - research and writing of report on sex fairness in disbursement of Federal funds through Education Division of HEW; part of above mentioned report.	9,891.

5. Contracts let by Council 1976 (continued from previous page):

o **Women on Words and Images** - research and writing of report on sex fairness in communications materials produced with Federal funds through Education Division of HEW; part of Council's several volume review of Education Division.	$9,892.
o **Mildred Bulpitt** - review of Commissioner's report on sex discrimination in access to education (review required by Women's Educational Equity Act).	500.
o **Norma Raffel** - review of Commissioner's report on sex discrimination in employment at institutions of higher education (review required by Women's Educational Equity Act).	500.
o **Mary Ellen Hilliard** - final report on Council review of Commissioner's reports on sex discrimination in education; includes development of recommendations for action by Commissioner and others.	1,500.
o **Mark Battle Associates** - WEEA Evaluation (required by Women's Educational Equity Act); evaluation of Program.	38,926.
o **Hager, Sharp and Associates** - editorial and graphics services for four Council reports; includes complete copy preparation.	9,380.
o **Ada Kimsey** - editorial services for seven Council reports.	3,500.
o **New Age Design** - graphics and copy preparation for seven Council reports.	9,450.
o **Laura Kent** - editorial and copy preparation services for general audience booklets on findings of Commissioner's reports on sex discrimination in education.	5,190.
o **Carol Becker** - compilation and writing of report on public input into Council through public participation sessions.	2,500.
o **Feminist Press Research Foundation** - research and writing of report on women's studies programs.	24,999.
o **JoAnn Steiger** - representation of Council at Career/Vocational Education conferences including Commissioner's Career Education Conference in Houston, TX.	2,000.
o **Harris Associates** - Development and improvement of Council operating procedures.	2,400.
FY 1976 total:	$147,312.

No contracts were competitive in FY 1976 except Mark Battle Associates' evaluation of the WEEA Program.

5. Contracts let by Council (continued from previous page):

1977

		Due
o Hager, Sharp and Associates - development of dissemination techniques for Council and dissemination of Council report on educational needs of rural women and girls.	$2,000.	4/77
o Mark Battle Associates - development of ongoing evaluation design for use of Council personnel in FY 78 and afterward.	8,400.	10/77
o Mark Battle Associates - orientation of Council personnel in use of evaluation design ; data collection services.	5,550.	9/78
o Mark Battle Associates - Data analysis activities for FY 78 evaluation of WEEA Program.	5,500.	9/78
o Frank Till - development and implementation of storage and retrieval system for Council office.	1,300.	8/77
o Martha Lewis - representation of Council at annual conference of Wisconsin Agriwomen (follow up on Council's report on educational needs of rural women and girls).	375.	11/77
o Nancy Balles - review of Title IX enforcement activities by Federal agencies other than HEW.	3,500.	11/77
o Women on Words and Images - development of guidelines for sex fair communications in Education Division of HEW.	1,300.	10/77
o American Association of Community and Junior Colleges - research and development of report on educational needs of displaced homemakers, single parents and mature women; includes planning and conducting of public consultation sessions, writing of report.	9,800.	7/78
o American Indian Law Center - research and development of report on educational needs of Indian women and girls; writing of final report.	9,950.	12/77
FY 1977 total:	$47,675.	

No contracts were competitive in FY 1977.

MEMORANDUM

TO: The Honorable Carl D. Perkins, Chairman
House Committee on Education and Labor
Subcommittee on Elementary, Secondary,
and Vocational Education

FROM: Roberta Lovenheim, Executive Director

SUBJECT: Additional Information for the Hearing Record on National Advisory Councils

On August 4, 1977, Dr. Wilbur H. Lewis, Vice Chairman, presented testimony before the House Committee on Education and Labor, Subcommittee on Elementary, Secondary, and Vocational Education. On August 11, 1977, the Honorable Carl D. Perkins requested additional information for the Hearing Record on National Advisory Councils. The following represents the same:

(1) What is the total amount of salaries, including all benefits, paid to council members for meetings, site visits, and other work assignments?

	FY 76	TRANSITION QUARTER	TOTAL	FY 77
Full Council	$23,000.00	13,800.00	36,800.00	30,300.00
Benefits	1,345.50	807.30	2,152.80	1,772.55
Subcommittee	4,240.00	2,600.00	6,840.00	3,000.00
Benefits	248.04	152.10	400.14	175.50
On-Site & Other	4,500.00	3,500.00	8,000.00	4,440.00
Benefits	263.25	204.75	468.00	259.74
TOTAL	$33,596.79	21,064.15	54,660.94	39,047.79

(2) What is the total amount of salaries, including benefits paid to council staff?

PERMANENT

(Salaries of each permanent staff attached)	132,080.00	38,739.68	170,819.68	156,527.17
Benefits	12,019.28	3,525.31	15,544.59	12,715.60
TOTAL	144,099.28	42,264.99	185,364.27	169,242.77

(3) What is the total amount expended for travel by council members, including transportation, per diem, and miscellaneous expenses?

	FY 76	TRANSITION QUARTER	TOTAL	FY 77
Full Council	$24,436.34	10,689.21	35,125.55	24,122.42
Subcommittee	6,762.27	5,000.00	11,762.27	3,505.00
Sites & Other	6,437.97	677.59	7,115.56	2,981.37
TOTAL	$37,636.58	16,366.80	54,003.38	30,608.79

(4) What are the total funds expended for travel by all staff, including transportation, per diem, and miscellaneous expenses?

On-Site	7,196.85	1,850.14	9,046.99	3,693.56
TOTAL	7,196.85	1,850.14	9,046.99	3,693.56

(5) NOT APPLICABLE.

NATIONAL ADVISORY COUNCIL ON THE EDUCATION
OF DISADVANTAGED CHILDREN
425 Thirteenth Street, N.W., Suite 1012
Washington, D.C. 20004
(202) 382-6945

PERSONNEL	FY 76 7/1/75 - 9/30/76 (15 months)	FY 77 10/1/76 - 9/30/77 (12 months)
Salaries	$170,819.68	$156,527.17
Benefits	15,544.59	12,715.60
TOTAL	$185,364.27	$169,242.77
TRAVEL & PER DIEM		
Staff	$ 9,046.99	$ 3,693.56
Council	54,003.38	20,608.79
HONORARIA	$51,640.00	$36,340.00
Benefits	3,020.94	2,678.87
TOTAL	$54,660.94	$39,018.87

NATIONAL ADVISORY COUNCIL ON THE EDUCATION OF DISADVANTAGED CHILDREN

425 Thirteenth Street, N.W., Suite 1012
Washington, D.C. 20004
(202) 382-6945

FISCAL YEAR 1977

Permanent Staff -

Pay periods thru 9-30-77	$156,527.17
Fringe Benefits @ 9.1%	12,715.60
" " Travel	
Local Travel	250.00
Out of town meetings	3,693.56

Council members

Travel	30,608.79
Honoraria	36,340.00
FICA	2,623.97
Treasury	54.90

OBLIGATED

Vouchers submitted - unpaid	5,825.31
Vouchers to be submitted	2,700.00
Honoraria to be submitted (other)	1,400.00
FICA	81.90
Treasury	14.64
GPO - Printing Annual Report	4,600.00
GPO - Rural Report Printing	4,000.00
GSA	1,000.00
XEROX	4,800.00
Subscriptions	549.05
IBM Maintenance	390.04
Training	450.00
NACVE (graphics)	432.24
Office Equipment	287.91
Lump sum accruals (leave)	4,422.19
TOTAL	$270,000.00

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

[illegible]

Mr. Jack Jennings, Counsel
Subcommittee on Elementary and
Secondary Education
Room B-346-C Rayburn Building
Washington, D.C. 20515

Dear Mr. Jennings:

Since our last correspondence to you of August 12, we have learned of Mr. Carl Perkin's letter to the Chairpersons of each Advisory Council requesting additional information on the budget. In compliance with this request we have enclosed the budget breakdown for the Community Education Advisory Council and funds expended by the U.S. Office of Education for support staff.

Additionally, I would like to mention that the GSA report for Calendar Year 1976 shows an estimated expenditure for 1977 as $273,000. This esimate included a request for $200,000 for the evaluation study to be conducted by the Council of the Federal Community Education Program. The Community Schools Act requires that the Council present to Congress annually, an evaluation of the program. However, only $150,000 was actually appropriated for the Council for Fiscal Year 1977.

If further information if needed, please do not hesitate to call us.

Sincerely,

Paul Tremper

Paul Tremper
Acting Director
Community Education Program

Enclosure

BUDGET BREAKDOWN FOR COMMUNITY EDUCATION ADVISORY COUNCIL FOR FISCAL YEAR 1976 AND TRANSITION QUARTER

Appropriation Fiscal Year 1976: $150,000

Category		Expenditures
Meetings		$ 23,894
(Four full Council meetings were held in Fiscal Year 1976. Following is a breakdown of expend-for these meetings.)		
(Travel	8,082)	
(Per Diem	3,417)	
(Travel Miscellaneous	1,082)	
(Honorarium	8,600)	
(FICA	491)	
(Payroll	156)	
(Recording Services	2,066)	
Other Travel		1,586
Per diem		599
Miscellaneous		315
(Aside from travel expenses incurred for Council meetings (Council members only) travel was paid for nine consultants who were brought to Washington, D.C. for the purpose of making recommendations on a handbook on "Needs Assessment" which is one of the criteria which must be met by applicants applying for funds under the Community Schools Act--no honorarium was paid to this panel.)		

Contracts

1. Awarded to: Mr. Arthur Boyd ------------------ 2,500
   Management Consultant
   Chevy Chase, Maryland

   Method of Contracting: Sole Source

   Purpose: To prepare publication entitled "Evaluation Today in Community Education"

Printing	3,700

(The publications "Needs Assessment" and)
("Evaluation Today in Community Education")
(were printed by GPO.)

TRANSITION QUARTER ($100,000 was carried over from Fiscal Year 1976 budget appropriation

Appropriation for Transition Quarter: $73,500

Category	Expenditures
Meetings	$12,010

(Two full Council meetings were held during)
(the Transition Quarter. Following is a)
(breakdown of expenditures for these meetings)

(Travel	5,026)
(Per diem	2,004)
(Travel, Miscellaneous	342)
(Honorarium	4,200)
(Rentals	116)
(FICA	245)
(Payroll	77)

Contracts	119,045

(It was recommended by the Council that a)
(series of studies and reports be undertaken)
(in order to further the concept of community)
(education and to meet the needs of)
(practitioners working in the field of)
(community education. Thirteen small)
(contracts were awarded for this purpose.)
(Attached is a list providing details on)
(these contracts.)

TOTAL EXPENDITURES FOR FISCAL YEAR 1976 AND THE TRANSITION QUARTER AMOUNTED TO: 163,649

BUDGET BREAKDOWN FOR COMMUNITY EDUCATION ADVISORY COUNCIL FOR FISCAL YEAR 1977

Appropriation for Fiscal Year 1977: $150,000

Category		Expenditures
Meetings		$ 33,104
(Five full Council meetings were held in Fiscal) (Year 1977. Following is a breakdown of expend-) (itures for these meetings.)		
(Travel*	14,008)	
(Per diem	6,688)	
(Travel, Miscellaneous	1,177)	
(Honorarium	10,000)	
(FICA	595)	
(Central Payroll	203)	
(Rentals	233)	
(Supplies	200)	
Contracts		100,000

Contract Awarded to: Development Associates
Washington, D.C.
Method of contracting: RFP
Delivery Date: March 30, 1978

The Community Education Advisory Council is mandated to create a system for evaluation of the programs funded under the Community Schools Act and to present to Congress a complete and thorough evaluation of the programs for each fiscal year.

Category	Expenditures
Printing	3,207
Other travel	444
Per Diem	233
Travel Miscellaneous	118

(Aside from travel expenses incurred for Council)
(meetings, travel funds were expended for the)
(Chairman of the Council to attend two meetings)

---

*Includes travel for one OE staff member who takes minutes of meeting, makes arrangements for conference room, etc., in lieu of hiring recording services.

(in Washington, D.C. with other Office of)
(Education Councils for the purpose of promoting)
(cooperation and an interelationship among the)
(Councils. Two more visits were made to)
(Washington, D.C. during Fiscal Year 1977; (1))
(by the Chairman to testify before the Sub-)
(committee on Elementary and Secondary and)
(Vocational Education; and (2) in the absence)
(of the Council Chairman, Mrs. Kimmel, member)
(of the Council, appeared before the special)
(Hearings held by the U.S. Office of Education.)

Other honorarium ------------------------------------ $300
(Honorarium was paid to the Chairman for three)
(days of meetings with other Office of Education)
(Councils.)

EXPENDITURES FOR STAFF SUPPORT FOR COMMUNITY EDUCATION ADVISORY COUNCIL

FISCAL YEAR 1976

In Fiscal Year 1976 a total of 1.4 person years were used in support staff for the Community Education Advisory Council. Follows is a breakdown of the person years used and expenditures incurred by the support staff.

Salary		
75 percent - GS-7 Program Assistant	($10,946)	
38 percent - GS-5 Secretary	($ 3,535)	
13 percent - GS-14 OE Delegate	($ 3,858)	= $18,339
Travel - Council meetings		= 1,735
Per diem		948
Travel Miscellaneous		151

(The Council held three out of town meetings in)
(Fiscal Year 1976 with a total of nine OE staff)
(participating. The OE staff in attendance)
(included the OE Delegate, OE General Counsel and)
(two staff persons.)

Payroll		= 17

(Nine travel checks for meetings attended by OE)
(staff at $1.87 per check)

Taxi

(Four round trip taxi fares to Federal Register) (to deliver announcement of Council meetings at) ($2.50 each.)		= 10
	TOTAL	= $21,200

TRANSITION QUARTER - STAFF SUPPORT EXPENDITURES

In the Transition Quarter the person years used to provide support staff to the Advisory Council remained the same as in Fiscal Year 1976.

Salary	
(Same as Fiscal Year 1976 - one-quarter of salaries) (are shown.)	= $4,584
Travel -- Council meeting	= 752
Per diem	297
Travel Miscellaneous	34
(The Council held one meeting out of town during) (this time. A total of three OE staff persons) (attended.)	
Payroll	= 6
(Three travel checks for meetings attended by OE) (staff at $1.87 per check)	
Taxi	= 5
(Two round trip taxi fares to the Federal Register) (to deliver announcement of the Council meetings) (at $2.50)	
TOTAL	$ 5,678

FISCAL YEAR 1977 - STAFF SUPPORT EXPENDITURES

Salary

(Same as Fiscal Year 1976) = $18,339

Travel - Council Meetings = 688
Per Diem 493
Travel Miscellaneous 126

(Three out of town Council meetings were held during)
(this time. OE paid for one staff person to attend.)

Other Travel = 92
Per Diem 16
Travel Miscellaneous 9

(OE Delegate traveled to Columbus, Ohio to meet)
(with Chairperson of the Council.)

Payroll

Four travel for meetings attended by OE delegate at $1.87 per check = 7.48

Taxi = 12.50

(A total of five Council meetings were held to date)
(in Fiscal Year 1977 - Five round trip taxi fares)
(to Federal Register to deliver announcement of)
(Council meetings at $2.50 each.)

TOTAL = $19,782.98

CONTRACTS LET FISCAL YEAR 1976--Transition Quarter

SUMMARY OF PROJECTS

UNDERTAKEN BY THE

COMMUNITY EDUCATION ADVISORY COUNCIL

Subject Area	Organization
1. Administrators Role in Community Education	American Association of School Administrators

The purpose of this project will be to produce a monograph of approximately 80 pages on the Role of Administors in Community Education. The monograph will be developed by a consultant/author that is jointly approved by AASA and the U.S. Office of Education. Results of the study will be reported to the leadership in a manner that is approved both by the U.S. Office of Education and AASA.

Method of Contracting: Competitive $6,991.00
Delivery Date: 9/30/77

2. Aging and Community Education	National Council on Aging

The purpose of the project will be to develop a Handbook on Aging/Community Education for distribution to the aging and community education networks. A major thrust of the handbook will be an examination of several exemplary community education models that involve the elderly both as a consumer and a contributor to the community. The findings of the study will be presented, through an appropriate forum, at the Annual Convention of the National Council on Aging to be held in Washington, D.C. in April 1977.

Method of Contracting: Competitive $9,990.00
Delivery Date: 7/31/77

3. Catalog of Federal Programs	University of Michigan Community Education Research Center

The purpose of the project will be to develop a catalog of Federal Programs that are related to community education. The catalog will include information about:

a. Primary Resources - Those where funds are immediately available.

b. Secondary Resources - Those where funds are not currently available but where funds may become available.

c. An examination of existing policy statements supporting community education that already exist within governmental units and related organizations.

Method of Contracting: Sole Source $9,511.00
Delivery Date: 5/30/77

4. Community College Models — American Association of Community and Junior Colleges

A handbook will be developed that will detail several models for community education involving community colleges and local public school districts.

Method of Contracting: Sole Source $5,045.00
Delivery Date: 5/30/77

5. Community Education and the Hearing Impaired — Gallaudet College

Two manuals will be developed that will present alternative models for bringing the hearing community and the deaf community closer together through the vehicle of community education. One publication will detail techniques that can be utilized to develop closer working relationships between state community education and hearing impaired leaders. The second publication will focus on means and techniques for involving state schools for the deaf in community education programs.

Method of Contracting: Sole Source $9,500.00
Delivery Date: 6/30/77

6. Community Participation — Northwest Regional Laboratory

A handbook, approximately 80 pages in length will be developed that will provide a thorough analysis of community participation as well as alternative approaches for achieving meaningful community involvement. Descriptive information will be provided on at least two rural, suburban and urban approaches. The Northwest Laboratory will also be responsible for designing a system for dissemination of the results of the study on a variety of audiences.

Method of Contracting: Competitive $9,929.00
Delivery Date: 8/15/77

Subject Area	Organization
7. Cooperation, Consultation and Cooperative Agreements	National Community Education Association

The purpose of the project is to prepare a publication that includes a process for developing agency relationships, a listing of typical agencies that are found within communities, four models or samples of cooperative agreements and a delineated process for developing a cooperative agreement.

Method of Contracting: Sole Source $9,674.00
Delivery Date: 6/30/77

8. Future of Community Education	Hudson Institute

The purpose of this project is to develop a paper which will deal with the ten-year future of elementary and secondary education in the context of community education. The product will be a "think piece" which will be made available to community education leaders and scholars who will figure prominently in the leadership of community education in the decade ahead.

Method of Contracting: Sole Source $9,150.00
Delivery Date: 6/1/77

9. Life-Long Learning and Community Education	Coalition of Adult Education Organization

The purpose of the study will be to study the relationship between life-long learning and community education. Among the questions and issues that will be probed and analyzed are the following:

1. What are the similarities, as well as the differences, between the two movements and philosophies?
2. What roles should community educators play in life-long learning programs?
3. Are there exemplary programs in existance that illustrate close working relationships between the two programs?

A panel of distinguished adult and community education leaders will be utilized to analyze the above mentioned issues. Hopefully, the recommendations offered by the above mentioned groups will lead to future cooperative efforts between adult and community educators.

Method of Contracting: Competitive $9,805.00
Delivery Date: 7/1/77

Subject Area	Organization
10. Recreation Models	National Recreation and Park Association

The overall purpose of this project is to develop and/or identify effective models and case studies between parks and recreation and community education that can be utilized in a variety of settings. A project review committee will meet to assist in the selection of field sites, development of data and finalization of effective models.

Method of Contracting: Sole Source
Delivery Date: 7/1/77 $9,650.00

11. Role of State Education Agency in Community Education	Council of Chief State School Officers

The Council of Chief State School Officers will help to determine the appropriate future community education roles for state departments of education by:

1. Assessing perceptions of the Chief State School Officers about existing roles.
2. Defining appropriate future state roles.
3. Recommending methods for implementing the appropriate state roles.

Method of Contracting: Sole Source
Delivery Date: 5/30/77 $9,847.00

12. Statements on Community Education	Eastern Michigan University Center for Community Education

The project will research the history of community education by analysis of literature and by interviewing leaders in community education. Based upon the information obtained, an acceptable contemporary perspective statement will be composed which will delineate community education: whence it came, where it is now, and where it is going. Secondly, against the backdrop of this contemporary perspective, the project will display statements from a large number of prominent American leaders supporting the community education concept.

Method of Contracting: Sole Source $9,978.00
Delivery Date: 6/30/77

	Subject Area	Organization
13.	Teacher Training and Community Education	American Association of Colleges and Teacher Education

The major purpose of the proposed project is to delineate approaches to infusing community school concepts into pre-service teacher training programs and to develop dissemination materials. One method of disseminating the results of the study will be to utilize a forthcoming issue of the Journal of Teacher Education. A major component of the issue will be devoted to the concept and practice of community schools, particularly the promotion of education personnel for them.

Method of contracting: Sole Source $9,975.00
Delivery Date: 8/30/77

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
NATIONAL ADVISORY COUNCIL ON BILINGUAL EDUCATION
WASHINGTON, D.C. 20202

MEMORANDUM AUG 1 9 1977

TO : Mr. Carl D. Perkins, Chairman
Sub-Committee on Education and Labor

FROM : Mr. James D. Lehman, Member
National Advisory Council on Bilingual Education

SUBJECT: Additional information requested at the Sub-Committee Hearings on August 4, 1977

I'm writing pursuant to your memo dated August 11, 1977, requesting additional information for the hearing record on National Advisory Councils. Attached you will find responses to your questions. Also please know that responses were formulated as appropriate to the operation of the National Advisory Council on Bilingual Education.

I hope you will find the data provided herewith of some value pursuant to the consideration being given by your sub-committee to the Federal Advisory Council Act or the General Education Provisions Act.

As a member of the National Advisory Council on Bilingual Education, I would be remiss of my responsibilities if I did not restate our contempt for OE's proposed plan to consolidate the National Advisory Council on Bilingual Education with dissimilar councils from Teacher Corp, Right to Read, and Career Education. This absurd plan not only defies logic but smacks of gross lack of sensitivity for the over 3½ million children of limited English-speaking ability affected by the Bilingual Education Act. As is so often the case for persons of limited English-speaking ability, the classic logic which prevails in matters affecting us is one which calls for consolidation, isolation, and or doing simply nothing.

The National Advisory Council on Bilingual Education urges that serious consideration be given to the continuation of the council and that OE's (motivational logic) of grouping the National Advisory Council on Bilingual Education with Teacher Corp, Right to Read, and Career Education simply because "we nad no other place to put it" be seriously reexamined.

Again, it is a real pleasure to have assisted in this endeavor and please do not hesitate to contact the National Advisory Council on Bilingual Education if we may be of any further assistance.

QUESTION I: What is the amount of salaries, including all benefits, paid to council members for meetings, site visits, other work assignments?

NAME: Mrs. Paula Alleva

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$1,600.00

Site Visits: Mrs. Paula Alleva visited two school districts in New York at her own expense.

Others: None

Total: 7

NAME: Dr. Fernando Alvarez:

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, Texas	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$1,600.00

Site Visits: None

Others: None

Total: 5

NAME: Mrs. Rosalie Bassett

Meetings	City	Honorarium
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$800.00

Site Visits: NONE
Others: None

Total: 2

QUESTION I: (continued)

NAME: Mrs. Gudelia Betancourt

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	(Did Not Attend)
		$1,300.00

Site Visits: None

Others: None

Total: 4

NAME: Dr. Alfredo G. de los Santos, Jr.

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	(Did Not Attend)
June 17-19, 1977	Washington, D.C.	$300.00
		$1,100.00

Site Visits: May 9, 1977
Austin, TX to Washington, D.C.

Transportation	246.00
Per Diem	50.00
Miscellaneous	10.00
Total	306.00

February 23-26, 1977
Austin, TX to Tucson, AZ & Los Angeles, CA

Transportation	257.00
Per Diem	70.00
Miscellaneous	55.00
Total	382.00

Others: None

Total: 6

QUESTION I: (continued)

NAME: Mrs. Evelyn Fatolitis

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C. Did Not Attend)	
		$1,300.00

Site Visits: None

Others: None

Total: 4

NAME: Dr. Lorraine Gutierrez

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$1,600.00

Site Visits: None

Others: None

Total: 5

QUESTION I: (continued)

NAME: Dr. Richard Hsu

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$1,600.00

Site Visits: None

Others: None

Total: 5

NAME: Mr. James Lehmann

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	(Did Not Attend)
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	(Did Not Attend)
		$1,100.00

Site Visits: None

Others: August 4, 1977
Austin, TX to Washington, D.C.

Purpose: To Testify at the Sub-Committee Hearings

Transportation	$256.00
Per Diem	$150.00
Miscellaneous	30.00
	$436.00

Total: 4

QUESTION I: (continued)

NAME: Dr. Evelyn P. Lytle

Meetings	City	Honorarium
September 24-26, 1977	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	(Did Not Attend)
		$1,300.00

Site Visits: None

Others: May 13-14, 1977
New Orleans, LA to Washington, D.C.

Purpose: To attend a meeting involving all Advisory Council Chairpersons

Transportation	$194.00
Per Diem	$100.00
Miscellaneous	20.00
	$314.00

February 14-15, 1977
New Orleans, LA to Washington, D.C.

Purpose: To attend NIE Conference

Transportation	$194.00
Per Diem	$103.70
Miscellaneous	22.30
	$320.00

October 22, 1976
New Orleans, LA to Washington, D.C.

Purpose: To attend Conference at Center for Applied Linguistics

Transportation	$194.00
Per Diem	$ 74.37
Miscellaneous	45.00
	$313.37

Total: 7

QUESTION I: (continued)

NAME: Mr. Omer Picard

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$1,600.00

Site Visits: None

Others: None

Total: 5

NAME: Mr. Carmelo Rodriguez

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C. (Did Not Attend)	
		$1,300.00

Site Visits: None

Others: May 9, 1977
Chicago, Illinois to Washington, D.C.

Purpose: To Meet with Inter-America Associates regarding the Third Annual Report to Congress

Transportation	$144.00
Per Diem	75.00
Miscellaneous	20.00
	$239.00

Total: 5

QUESTION I: (continued)

NAME: Mrs. Teresa Sun

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	$300.00
November 11-12, 1976	San Francisco, CA	$200.00
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	$500.00
June 17-19, 1977	Washington, D.C.	$300.00
		$1,600.00

Site Visits: None

Others: November 25, 1976
Palos Verdes, CA to New Orleans, LA

Purpose: To attend Foreign Language Teachers Association Conference

Transportation	$259.00
Per Diem	78.00
Miscellaneous	30.00
	$367.00

November 13, 1976
Palos Verdes, CA to Los Angeles, CA

Purpose: To attend Indo-Chinese Conference

Transportation	$-0-
Per Diem	$13.00
Miscellaneous	$2.00
	$15.00

Total: 7

QUESTION I: (continued)

NAME: Mr. Webster Two Hawk

Meetings	City	Honorarium
September 24-26, 1976	Washington, D.C.	(Did Not Attend)
November 11-12, 1976	San Francisco, CA	(Did Not Attend)
January 27-29, 1977	Austin, TX	$300.00
April 4-8, 1977	New Orleans, LA	(Did Not Attend)
June 17-19, 1977	Washington, D.C.	(Did Not Attend)
		$300.00

Site Visits: None

Others: None

Total: 1

QUESTION II: None applicable to NACBE

QUESTION III: What is the total amount expenditure for travel by Council members, including transportation, per diem, and miscellaneous expenses?

NAME: Mrs. Paula Alleva

MEETINGS: September 24-26, 1976
Brooklyn, New York to Washington D.C.

Transportation	$76.00
Per Diem	$143.00
Miscellaneous	$30.00
Total	$249.00

November 11-12, 1976
Brooklyn, New York to San Francisco, CA

Transportation	$404.00
Per Diem	$136.00
Miscellaneous	$ 20.00
Total	$560.00

January 27-29, 1977
Brooklyn, New York to Austin, Texas

Transportation	$270.00
Per Diem	$149.00
Miscellaneous	$ 20.00
Total	$439.00

April 4-8, 1977
Brooklyn, New York to New Orleans, LA

Transportation	$228.00
Per Diem	$227.00
Miscellaneous	$ 40.00
Total	$495.00

QUESTION III: (continued)

NAME: Mrs. Paula Alleva (continued)

Meetings: June 17-19, 1977
Brooklyn, New York to Washington, D.C.

Transportation	$76.00
Per Diem	112.00
Miscellaneous	30.00
Total	$218.00

NAME: Dr. Fernando Alvarez

Meetings: September 24-26, 1976
Maspeth, New York to Washington, D.C.

Transportation	$74.00
Per Diem	110.00
Miscellaneous	20.00
Total	$204.00

November 11-12, 1976
Maspeth, New York to San Francisco, CA

Transportation	$404.00
Per Diem	$145.00
Miscellaneous	20.00
Total	$569.00

January 27-29, 1977
Maspeth, New York to Austin, TX

Transportation	$270.00
Per Diem	$149.00
Miscellaneous	20.00
Total	$439.00

STION III: (continued)

E: Dr. Fernando Alvarez (continued)

tings: April 4-8, 1977
Maspeth, New York to New Orleans, LA

Transportation	$228.00
Per Diem	$157.00
Miscellaneous	50.00
Total	$435.00

June 17-19, 1977
Maspeth, New York to Washington, D.C.

Transportation	$76.00
Per Diem	112.00
Miscellaneous	30.00
Total	$218.00

NAME: Ms. Rosalie Bassett

Meetings: April 4-8, 1977
Yakima, Washington to New Orleans, LA

Transportation	$417.00
Per Diem	$230.00
Miscellaneous	60.00
Total	$714.00

June 17-19, 1977
Yakima, Washington to Washington, D.C.

Transportation	$392.00
Per Diem	$150.00
Miscellaneous	30.00
Total	$572.00

QUESTION III: (continued)

NAME: Mrs. Gudelia Betancourt

Meetings: September 24-26, 1976
Hollis, New York to Washington, D.C.

Transportation	$74.00
Per Diem	110.00
Miscellaneous	20.00
Total	$204.00

November 11-12, 1976
Hollis, New York to San Francisco, CA

Transportation	$404.00
Per Diem	$186.00
Miscellaneous	30.00
Total	$620.00

January 27-29, 1977
Hollis, New York to Austin, TX

Transportation	$270.00
Per Diem	$149.00
Miscellaneous	20.00
Total	$439.00

April 4-8, 1977
Hollis, New York to New Orleans, LA

Transportation	$228.00
Per Diem	$227.00
Miscellaneous	40.00
Total	$495.00

June 17-19, 1977
Did Not Attend

QUESTION III: (continued)

NAME: Dr. Alfredo G. de los Santos, Jr.

Meetings: September 24-26, 1976
Austin, Texas to Washington, D.C.

Transportation	$298.00
Per Diem	$173.00
Miscellaneous	10.00
Total	$481.00

November 11-12, 1976
Austin, Texas to San Francisco, CA

Transportation	$270.00
Per Diem	$186.00
Miscellaneous	30.00
Total	$486.00

January 27-29, 1977
Austin, Texas

No Cost because member lives in Austin

April 4-8, 1977
New Orleans, LA

Did Not Attend

June 17-19, 1977
Washington, D.C.

Transportation	$246.00
Per Diem	$100.00
Miscellaneous	30.00
Total	$376.00

QUESTION III: (continued)

NAME: Mrs. Evelyn Fatolitis

Meetings: September 24-26, 1976
Port Richey, FL to Washington, D.C.

Transportation	$168.00
Per Diem	$110.00
Miscellaneous	20.00
Total	$298.00

November 11-12, 1976
Tarpon Springs, FL to San Francisco, CA

Transportation	$392.00
Per Diem	$145.00
Miscellaneous	20.00
Total	$557.00

January 27-29, 1977
Tarpon Springs, FL to Austin, TX

Transportation	$200.00
Per Diem	$148.00
Miscellaneous	20.00
Total	$368.00

April 4-8, 1977
Tarpon Springs, FL to New Orleans, LA

Transportation	$132.00
Per Diem	$219.00
Miscellaneous	50.00
Total	$401.00

June 17-19, 1977
Washington, D.C.

Did Not Attend

QUESTION III: (continued)

NAME: Dr. Lorraine Gutierrez

Meetings: September 24-26, 1976
Albuquerque, New Mexico to Washington, D.C.

Transportation	$288.00
Per Diem	$168.00
Miscellaneous	20.00
Total	$476.00

November 11-12, 1976
Albuquerque, New Mexico to San Francisco, CA

Transportation	$319.00
Per Diem	$135.00
Miscellaneous	20.00
Total	$474.00

January 27-29, 1977
Albuquerque, NM to Austin, TX

Transportation	$144.00
Per Diem	$140.00
Miscellaneous	20.00
Total	$304.00

April 4-8, 1977
Albuquerque, New Mexico to New Orleans, LA

Transportation	$208.00
Per Diem	$219.00
Miscellaneous	60.00
Total	$487.00

June 17-19, 1977
Albuquerque, NM to Washington, D.C.

Transportation	$294.00
Per Diem	$100.00
Miscellaneous	30.00
Total	$424.00

QUESTION III: (continued)

NAME: Dr. Richard Hsu

Meetings: September 24-26, 1976
Westfield, New Jersey to Washington, D.C.

Transportation	$72.00
Per Diem	$173.00
Miscellaneous	20.00
Total	$265.00

November 11-12, 1976
Westfield, New Jersey to San Francisco, CA

Transportation	$404.00
Per Diem	$145.00
Miscellaneous	20.00
Total	$569.00

January 27-29, 1977
Westfield, New Jersey to Austin, TX

Transportation	$270.00
Per Diem	$166.00
Miscellaneous	20.00
Total	$456.00

April 4-8, 1977
Westfield, New Jersey to New Orleans, LA

Transportation	$228.00
Per Diem	$158.00
Miscellaneous	20.00
Total	$406.00

June 17-19, 1977
Westfield, New Jersey to Washington, D.C.

Transportation	$76.00
Per Diem	$113.00
Miscellaneous	30.00
Total	$219.00

QUESTION III: (continued)

NAME: Mr. James Lehmann

Meetings: September 24-26, 1976
Eagle Pass, Texas to Washington, D.C.

Transportation	$252.00
Per Diem	$173.00
Miscellaneous	20.00
Total	$445.00

November 11-12, 1976
Did Not Attend

January 27-29, 1977
Seattle, Washington to Austin, Texas

Transportation	$306.00
Per Diem	$166.00
Miscellaneous	20.00
Total	$492.00

April 4-8, 1977
Seattle, Washington to New Orleans, LA

Transportation	$356.00
Per Diem	$219.00
Miscellaneous	60.00
Total	$635.00

June 17-19, 1977
Washington, D.C.
Did Not Attend the Meeting

QUESTION III: (continued)

NAME: Dr. Evelyn P. Lytle

Meetings: September 24-26, 1976
New Orleans, LA to Washington, D.C.

Transportation	$194.00
Per Diem	$168.00
Miscellaneous	10.00
Total	$372.00

November 11-12, 1976
New Orleans, LA to San Francisco, CA

Transportation	$324.00
Per Diem	$154.00
Miscellaneous	20.00
Total	$498.00

January 27-29, 1977
New Orleans, LA to Austin, TX

Transportation	$119.00
Per Diem	$122.00
Miscellaneous	20.00
Total	$261.00

April 4-8, 1977
New Orleans, LA

Transportation	-0-
Per Diem	$96.00
Miscellaneous	$20.00
Total	$116.00

June 17-19, 1977
Washington, D.C.

Did Not Attend

QUESTION III: (continued)

NAME: Mr. Omer Picard

Meetings: September 24-26, 1976
Madawaska, Maine to Washington, D.C.

Transportation	$181.00
Per Diem	$252.00
Miscellaneous	20.00
Total	$453.00

November 11-12, 1976
Madawaska, Maine to San Francisco, CA

Transportation	$468.00
Per Diem	$166.00
Miscellaneous	30.00
Total	$664.00

January 27-29, 1977
Madawaska, Maine to Austin, TX

Transportation	$372.00
Per Diem	$140.00
Miscellaneous	20.00
Total	$532.00

April 4-8, 1977
Madawaska, Maine to New Orleans, LA

Transportation	$351.00
Per Diem	$237.00
Miscellaneous	30.00
Total	$618.00

June 17-19, 1977
Madawaska, Maine to Washington, D.C.

Transportation	$164.00
Per Diem	$100.00
Miscellaneous	30.00
Total	$294.00

QUESTION III: (continued)

NAME: Mr. Carmelo Rodriguez

Meetings: September 24-26, 1976
Chicago, Illinois to Washington, D.C.

Transportation	$142.00
Per Diem	$144.00
Miscellanecus	10.00
Total	$296.00

November 11-12, 1976
Chicago, Illinois to San Francisco, CA

Transportation	$306.00
Per Diem	$177.00
Miscellaneous	30.00
Total	$513.00

January 27-29, 1977
Chicago, Illinois to Austin, TX

Transportation	$194.00
Per Diem	$141.00
Miscellaneous	20.00
Total	$355.00

April 4-8, 1977
Chicago, Illinois to New Orleans, LA

Transportation	$178.00
Per Diem	$230.00
Miscellaneous	60.00
Total	$468.00

June 17-19, 1977
Washington, D.C.

Did Not Attend

QUESTION III: (continued)

NAME: Mrs. Teresa Sun

Meetings: September 24-26, 1976
Palos Verdes, CA to Washington, D.C.

Transportation	$384.00
Per Diem	$141.00
Miscellaneous	20.00
Total	$545.00

November 11-12, 1976
Palos Verdes, CA to San Francisco, CA

Transportation	$51.00
Per Diem	$125.00
Miscellaneous	20.00
Total	$196.00

January 27-29, 1977
Palos Verdes, CA to Austin, Texas

Transportation	$230.00
Per Diem	$140.00
Miscellaneous	20.00
Total	$390.00

April 4-8, 1977
Palos Verdes, CA to New Orleans, LA

Transportation	$294.00
Per Diem	$228.00
Miscellaneous	60.00
Total	$582.00

June 17-19, 1977
Palos Verdes, CA to Washington, D.C.

Transportation	$392.00
Per Diem	$138.00
Miscellaneous	50.00
Total	$580.00

QUESTION III: (continued)

NAME: Mr. Webster Two Hawk

Meetings: September 24-26, 1976
Washington, D.C.

Did Not Attend

November 11-12, 1976
San Francisco, CA

Did Not Attend

January 27-29, 1977
Austin, Texas from Rose Bud, South Dakota

Transportation	$294.00
Per Diem	$175.00
Miscellaneous	20.00
Total	$489.00

April 4-8, 1977
New Orleans, LA

Did Not Attend

June 17-19, 1977
Washington, D.C.

Did Not Attend

QUESTION IV: What are the total funds expenditure for travel by all staff, including transportation, Per Diem, and miscellaneous expenses?

NAME: Dr. John C. Molina
OE Program Delegate

MEETINGS: September 24-26, 1976
Held in Washington, D.C.

November 11-12, 1976
Washington, D.C. to San Francisco, CA

Transportation	$384.00
Per Diem	$174.00
Miscellaneous	40.00
Total	$606.00

January 27-29, 1977
Washington, D.C. to Austin, TX

Transportation	$240.00
Per Diem	$114.00
Miscellaneous	30.00
Total	$384.00

April 4-8, 1977
Washington, D.C. to New Orleans, LA

Transportation	$198.00
Per Diem	$184.00
Miscellaneous	40.00
Total	$422.00

June 17-19, 1977
Washington, D.C.

GRAND TOTAL: $1,412.00 (Title VII S&E Funds)
Not NACBE funds

QUESTION IV: (continued)

NAME: Ms. Robin Pascua
OE Program Delegate

MEETINGS: September 24-26, 1976
Held in Washington, D.C.

November 11-12, 1976
Washington, D.C. to San Francisco, CA

Transportation	$384.00
Per Diem	$189.00
Miscellaneous	30.00
Total	$623.00

This was Ms. Pascua's last meeting as the Program Delegate to the Council

GRAND TOTAL: $623.00 (Title VII S&E Funds) Not NACBE funds

QUESTION IV: (continued)

NAME: Mr. Ramon M. Chavez, Jr.
OE Program Delegate

MEETINGS: September 24-26, 1976
Was not the program delegate at the time

November 11-12, 1976
Washington, D.C. to San Francisco, CA

Transportation	$384.00
Per Diem	$189.00
Miscellaneous	50.00
Total	$623.00

January 27-29, 1977
Washington, D.C. to Austin, TX

Transportation	$240.00
Per Diem	$149.00
Miscellaneous	30.00
Total	$419.00

April 4-8, 1977
Washington, D.C. to New Orleans, LA

Transportation	$198.00
Per Diem	$184.00
Miscellaneous	40.00
Total	$422.00

June 17-19, 1977
Was no longer the Program Delegate

GRAND TOTAL: $1,464.00 (Title VII S&E Funds)
Not NACBE funds

QUESTION IV: (continued)

NAME: Mr. Joe Casares
OBE Staff to NACBE

MEETINGS: January 27-29, 1977
Washington, D.C. to Austin, Texas

Transportation	$240.00
Per Diem	$149.00
Miscellaneous	30.00
Total	$419.00

QUESTION V: Compile a list of all contracts let within the past 2 years, including name of contractor, total amount, purpose of contract, the delivery date, and whether contract was bid competitively.

NAME OF CONTRACTOR:

Inter-America Research Associates

TOTAL AMOUNT:

$30,000

PURPOSE OF CONTRACT:

To prepare the Second Annual Report to Congress

DELIVERY DATE:

November 1, 1976

BID COMPETITIVELY:

YES

NAME OF CONTRACTOR:

Inter-America Research Associates

TOTAL AMOUNT:

$30,000

PURPOSE OF CONTRACT:

To prepare the Third Annual Report to Congress

DELIVERY DATE:

November 1, 1977

BID COMPETITIVELY:

YES

QUESTION V: (continued)

NAME OF CONTRACTOR:

Mr. Joe Bernal

TOTAL AMOUNT:

$2,490

PURPOSE OF CONTRACT:

To prepare an issue paper for the National Advisory Council on "Maintenance versus Transitional Bilingual Education Programs".

DELIVERY DATE:

May 30, 1977

BID COMPETITIVELY:

No, because the contract was for less than $3,000

NAME OF CONTRACTOR:

Dr. Winston Yang

TOTAL AMOUNT:

$2,490

PURPOSE OF THE CONTRACT:

To prepare an issue paper for the National Advisory Council on "Issues Facing Asian and Pacific Island Groups in Developing and Implementing Bilingual Education Programs."

DELIVERY DATE:

June 30, 1977

BID COMPETIVELY:

No, because the contract was for less than $3,000

QUESTION V: (continued)

NAME OF CONTRACTOR:

Arawak Consulting Corporation

TOTAL AMOUNT:

$2,490

PURPOSE OF CONTRACT:

To prepare an issue paper for the National Advisory Council on "Federal Funding for Bilingual Education Programs, Demonstration versus Service versus Initial."

DELIVERY DATE:

June 30, 1977

BID COMPETITIVELY:

No, because the contract was for less than $3,000

August 10, 1977

Mrs. Gwen Awsumb
Chairman
National Advisory Council on
Equality of Educational Opportunity
1325 G Street, N.W., Suite 710
Washington, D.C. 20005

Dear Mrs. Awsumb:

At the conclusion of last week's hearing you were notified that the Subcommittee would be submitting additional questions to you regarding the activities of the National Advisory Council on Equality of Educational Opportunity. These questions are being provided through the means of a letter instead of being asked directly at the hearing due to the fact that the House was in session and the hearing could not be prolonged much beyond 12 o'clock.

The questions follow:

(1) In reviewing all the budgets of the councils represented at the hearing, your council's budget is noteworthy for the fact that it lists consultant fees for both fiscal years 1976 and 1977 in the amounts of approximately $34,500. Could you please explain this listed expenditure?

(2) Several years ago the Subcommittee heard reports that the National Advisory Council had sent all of its members and staff to a meeting in Hawaii of an educational group without any official business of the advisory council being conducted while the members were attending that meeting. Are these reports true and if they are, could you please explain the facts of the situation?

Thank you again for your participatinn at our hearing, and I know that the information supplied at that hearing will be very useful to the members.

Sincerely,

Carl D. Perkins
Chairman

CDP:Jp

NATIONAL ADVISORY COUNCIL
ON EQUALITY OF EDUCATIONAL OPPORTUNITY
1325 G Street N.W. – Suite 710, Washington, D.C. 20005

August 15, 1977

The Honorable Carl D. Perkins, Chairman
Committee on Education and Labor
B-346C Rayburn House Office Building
Washington, D. C. 20515

Dear Congressman Perkins:

In response to the questions posed in your letter of August 10, 1977, I am pleased to submit the following answers:

(1) The term "consultant" refers to the members of the Advisory Council and the "fees" are the honorariums paid for attendance at full Council meetings, committee meetings and site visitations made by the members themselves. Ours is a very active group; we have held 19 full Council meetings since February, 1973, and made many site visitations to monitor the use of ESAA funds by recipients of grants.

(2) At no time has the Council sent all its members to Hawaii; nor has the Council travelled anywhere else except in the conduct of official business. During 1974 Dr. Dale Parnell, then Superintendent of Education for the State of Oregon, was Chairman of our Council. The Council had its office in Portland and Jerry Fuller was the Executive Director. Three members of the Council (including Dr. Parnell) accompanied by Mr. Fuller made a site visitation to Hawaii where a program funded by an ESAA grant in excess of 2 million was monitored by the group. The visitation is fully documented as to what schools were visited, persons interviewed, etc. Two members lived on the west coast (Portland and Los Angeles) and one lived in New Mexico; the staff member lived in Portland. These locations have a bearing on the distance travelled.

I am sure you have received further documentation from our present Executive Director, Leo Lorenzo, now housed in our office more conveniently located in Washington, D. C. If there are any further questions, please let us hear from you.

Sincerely,

Gwen R. Awsumb

Gwen R. Awsumb
Chairman

cc: Mr. Leo Lorenzo

NATIONAL ADVISORY COUNCIL
ON EQUALITY OF EDUCATIONAL OPPORTUNITY
1325 G Street N.W. – Suite 710, Washington, D.C. 20005
phone: (202) 724-0221

August 18, 1977

The Honorable Carl D. Perkins
Chairman, House Committee on
Education and Labor
2181 Rayburn House Office Building
Washington, DC 20515

Dear Mr. Perkins:

Although Mrs. Gwen Awsumb, Chairman of the National Advisory Council on Equality of Educational Opportunity, responded to the questions proposed in the August 10th letter from the Subcommittee on Elementary, Secondary, and Vocational Education, she has asked me to supply your staff with additional information.

In relation to the first question as to money paid to consultants, this is merely the technical term for Council member. We were following established USOE budgetary procedures and nomenclature (see attached) whereby appointed Council members are considered as "special consultants" to the government. The forms required to be submitted by members, including Federal Employees Code of Ethics, fiscal disclosure, Conflict of Interest statements, etc., also attest to the fact they are special consultants to the agency.

With regard to the supposed full Council trip to Hawaii, someone must have given the Subcommittee false or misleading information. No member of this staff has ever been to Hawaii, although there are numerous ESAA programs there. In 1975, the Executive Director, Chairman, and two Vice Chairmen did make an on-site trip to Hawaii. Prior to any plans for an on-site visitation, extensive communication was carried on with Ms. Jean Fujimoto from Congresswoman Patsy Mink's office. Also contacted were the following:

Mary Ann Pyum, Health and Community Services Council,
Honolulu, Hawaii

Amy Cahill, Director, Operations Manong, Social
Sciences Research Institute, University of Hawaii

Ben Juasa, Governor's Office for Imigration Services,
Commission on Manpower and Social Improvement

Rose Yamada, Division of Compensatory Educational
Services, Department of Education, Honolulu, Hawaii

Mr. Frank Delia (Federal Programs), Department of
Education, Honolulu, Hawaii

Dr. Terchiro Hirata, Superintendent of Education
for State of Hawaii

Dr. Philip K. Ige, Assistant Superintendent, Office
of Instructional Services, Department of Education,
Honolulu, Hawaii

I am enclosing one of the trip reports for your review along with the basic itinerary which was established. Also enclosed for your review is a copy of a sign-in list which will provide you with undeniable proof that a meeting concerning ESAA did take place.

In the June, 1975 report to Congress and the Assistant Secretary, the Council made several recommendations which were a direct result of the site visits and meetings conducted in Hawaii. As you may recall, Congresswoman Mink also was successful in amending the ESAA eligibility criteria interpretations which allowed the State Department of Education to become eligible for a $2 million ESAA grant.

The Committee should know that there has been a consistant, yet subtle attempt to keep NACEEO from reviewing any projects outside the mainland boundaries. We have had individuals tell us there are problems with the ESAA programs in Guam, Samoa, Hawaii, Puerto Rico, Virgin Islands, and Alaska. NACEEO has also been asked to hold full Council meetings in Hawaii, Puerto Rico, and Alaska so the individuals concerned with equal educational opportunities and overcoming the educational disadvantages of minority group isolation would be afforded the same opportunities as are community people and educators in the continental United States. If advisory councils are truly meant to aid Congress, they must "see for themselves" in order to monitor program operations and administrative procedures. This requires holding general meetings to solicit public input, as well as specific site reviews over an extended period of time.

I hope that NACEEO will be allowed the opportunity to fully review the ESAA program wherever the purposes of the Emergency School Aid Act could or should be realized.

Sincerely,

Leo A. Lorenzo

LEO A. LORENZO
Executive Director

dl

Enclosures

cc: Mr. Jack Jennings
Mr. Chris Cross
Mrs. Gwen Awsumb

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

September 8, 1976

TO: PAC Executive Directors
SAC Program Delegates

FROM: Committee Management Officer

In preparation for first quarter (FY 1977) limitations, please complete the attached operating plan form for the first quarter only and return the original to me by September 15. Refer to your list of object classes to determine which charges belong in which category. If you are still in doubt about a particular expense, please call our office.

The first quarter operating plan total must be limited to 25% of your total limitation for fiscal year 1976, not including your additional transition quarter limitation and/or adjustments. In other words, 25% of the figure commonly accepted as your "1976 budget." If you don't know what that figure is, call me.

Some reminders:

1) No council has a SLUC charge.

2) PAC staff is 11.1; all council members are 11.37.

3) Staff and council member travel are not differentiated.

4) Don't forget payroll charges - 25.9K.

5) Photocopiers and other leased machines should be self-explanatory.

6) Other contracts are in 25.

7) Supplies are GSA-type and other small purchases. Equipment is furniture, typewriters, etc.

8) Telecommunications - 23.6 - are unusual charges over and above regular telephone service which is paid for by OE.

Many thanks.

AVB

Ann V. Bailey

Attachment

Allowee: ______________________ Attachment 1

OC	Description	First Quarter	Second Quarter	Third Quarter	Fourth Quarter
11.1	Permanent Comp.				
11.3	Temp. F/T				
11.3A	Temp. P/T				
11.37	Consultants				
11.5	Overtime				
11.8	Other				
11	Subtotal				
12.1A	Employee Adwards				
12.	Benefits				
12	Subtotal				
21.	Travel				
22.	Trans. of Things				
23.1	Rent (SLUC-Space)				
23.2	Data Equipment				
23.3	Photocopier				
23.4	Other Rentals				
23.5	Mail				
23.6	Telecommunications				
23.7	Other Utilities				
	Subtotal				
24.	Printing				
25.11	WCF				
25.12	ADP				
25.13	Other Reimbursables				
25.41	Field Readers				
25.71	SLUC-Recurring				
25.72	SLUC-Non-recurring				
25.9D	Training				
25.9K	Central Payroll				
25.	Other (Contracts)				
	Subtotal				
26.	Supplies				
31.	Equipment				
	TOTAL				

ITINERARY

NACEEO
Executive Committee Site Visitation

Honolulu, Hawaii

Thursday, April 3, 1975

9:00 a.m.

Rose Yamada
Compensatory Education Office of Instructional Services, State Department of Education
1270 Queen Emma Street - Room 1106
Phone: 548-4635

(She is arranging a meeting with Frank Delia, Bilingual Education)

Friday, April 4, 1975

9:30 a.m.

Mary Ann Pyun
Health and Community Services Council
200 N. Vinyard Boulevard - Room 602
Phone: 521-3861

(She is working on itinerary for this day - with Mr. Wake (Wau-kee), General Assistance Center - with the Chairman of the Local Advisory Committee

Monday, April 7, 1975

Possible meetings with Amy Cahill, Director of Operation Manong on Social Science Research Institute, University of Hawaii, and Ben Junasa, Director, Immigration Services Commission on Manpower and Social Improvement, Governor's Office (Amy Cahill - phone: 948-8187)

Tuesday, April 8, 1975

9 a.m.

Dr. Teichiro Hirata, Superintendent of Education
Superintendents' Group Meeting
Assistant Superintendents
Key staff people
Queen Liliu Okalani Boulevard
1390 Miller Street
Fourth Floor
Phone: 808-548-6405

ESAA

Your Name:	Project
Vicky Bunye	YWCA HC Tutorial Services Program
Elvena Park	Ohana Counseling ESAA
Bob Toda	General Assistance Center
Robert R. Umel	ESAA Castle Hi Kaneohe
David Ross	ESAA CASTLE H.S., Kaneohe
Miriam Conley	ESAA - KAHUKU Project - Kokokahi YWCA
Dwight Ovitt	ESAA - Kahuku Project - KoKoKahi YWCA
Ed Wake	Advisory Committee
Lehua Choo.	Immigrant/Minority Project, Catholic Social Service
Margaret McCauley	ESAA Ohana Counseling Project - Nanakuli High
Ben Junasa	advisory council member
Jean A. Lee	Supervisor, ESAA tutorial Services - [illegible] Immigrant Center of the YWCA of Oahu
Barbara Hunt P.O. Box 6037 Honolulu, Hi 96818	Bishop Museum

name	Position	Telephone
Florence A. Miller	School Community Coordinator	548-4584
Joanne Shida	Program Specialist	548-4635
Paul K. Mitsu	" Student Affairs Section	548-4079
FRANK DELIA	FED PROGRAM SPEC (on Loan from HEW)	5486485
ROSE A YAMADA	Administrator, Comp. Educ.	548-4635
HARRY WILFONG	Program Specialist II	548-4714
Clarence Masumotoya	Director of Federal Programs	548-311
Masao Osaki	Program Specialist	548-4714

STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

April 22, 1975

Mr. Jerry Fuller
Executive Director
National Advisory Council on Equality
of Educational Opportunity
United States Courthouse, Room 225
620 S.W. Main Street
Portland, Oregon 97205

Dear Jerry:

We are most appreciative of the National Advisory Council's assistance during its visit here last week, the opportunities to discuss Hawaii's unique problems and the materials you so promptly posted for us. We are confident that the materials will prove useful in our efforts to develop ESAA programs to meet our specific needs.

Although fiscal and work schedule constraints restrict our deriving the benefits of attending the San Francisco ESAA conference on May 1 and 2, we feel that maximal application of your counsel and suggestions will enable us to complete a satisfactory plan and appropriate programs.

We thank you for hosting the Chart House conference, which will be remembered and reciprocated by Hawaii in the near future.

Mahalo,

Rose

ROSE A. YAMADA
Administrator
Compensatory Education Section

RAY:yo

NOTES OF MEETING OF MEMBERS OF THE NATIONAL ADVISORY COUNCIL OF EQUALITY OF EDUCATIONAL OPPORTUNITY WITH REPRESENTATIVES OF LOCAL COMMUNITY ORGANIZATIONS AND AGENCIES WORKING WITH MINORITY GROUP/DISADVANTAGED YOUTH IN HONOLULU, HAWAII, HELD AT THE SUSANNAH WESLEY COMMUNITY CENTER, 1117 KAILI STREET, APRIL 4, 1975, AT 1:00 - 2:30 P.M.

PRESENT: Ann K. Aotani, Leeward YWCA
Harold Yokouchi, Trio Project
Robert Higashino, Palama Settlement
Puanani Kini, Kamehameha Schools
George Warfel, Susannah Wesley Community Center
Nola Nakata, Susannah Wesley Community Center
Martha D. Almon, Palama Interchurch Council
Ermile Hargrove, Parent
Ray M. Tanaka, Youth Services System/C&C of Honolulu
Bobbi Clavacillas, Leeward YWCA, Nanakuli Pre-employment Coun. Proj.
Richard E. Pesqueira, VP Student Services, Nex Mexico State University
Dale Parnell, Chancellor, San Diego Community College System
William Fuller, Exec. Dir., National Advisory Council on Equality of
Educational Opportunity (NACEEO)
Mary Ann Pyun, Health and Community Services Council of Hawaii

After introductions were made of persons present, Mr. Dale Parnell, Chairman of the NACEEO explained the purpose of the meeting to be one of gathering information and views of local persons first hand about the current Emergency School Assistance Act legislation and programs operating in Honolulu.

The meeting was informal with much open interchange of ideas and suggestions. A running listof comments are presented with a summary of the major ideas and suggestions:

1. In Hawaii, "Integration" should be one of integrating the whites into our multi-ethnic/multi-culturally represented society.

2. The problems here are more social economic than racial.

3. We have institutionalized stereotypes of the various ethnic groups and there is a need to study the implications of these on youngsters.

4. We need to do more about "racism" here - it is not acknowledged by the public institutions nor dealt with openly. We have no statewide policy about this.

5. In the public schools, most teachers are Japanese. There are not enough teachers or other role models of other ethnic groups for children to be in contact with.

6. Instead of integration, many in Hawaii hope for cultural pluralism where we can be who we are ethnically, maintain our identity and yet learn to respect and relate to others.

7. Rural schools get fewer resources than those in urban areas.

8. Bussing is not favored here.

9. Agencies or organizations and the general community have very little input into plans made by our school system.

10. The regulations for federal programs (ESAA) prevent people from applying because of the enormously vigorous and complicated procedures required.

11. We need to have programs that avoid negative labeling and which can focus on developing basic skills in the very young child.

12. Parent participation is crucial in programs to help kids, especially in ethnic groups like the Hawaiians where the values of strategies of school programs may differ from those at home. You have to bring parents and children along together.

13. Awareness of the uniqueness of each ethnic group is not apparent in school programs. Teachers are not sensitive. A parent reported she felt teacher attitudes of children of various minority groups were detrimental to the children.

KEY IDEAS RECAPPED AND SUGGESTIONS:

1. The need to deal with teacher attitudes that are negative to various minority group children.

2. The need for a variety role models of various ethnic groups to be present and interacting responsively with children is needed.

3. A concentration on the elementary age child, Gr. K, 1, and 2, in developing basic learning skills is critical.

4. Community input into planning for educational programs with the State education agency (not only ESAA) is badly needed. (An example of a public notice published in one of the daily newspapers for a meeting inviting the public on a Bilingual/Bicultural program was circulated. There was less than two days notice given.)

5. Teacher aides who could assist during and after school and who could serve as role models to youth are needed. The people who kids meet on the "streets" are far more exciting and attractive in comparison to teachers and other adult role models they are in regular contact with.

Notes to be distributed to persons present at the meeting, to Representative Patsy Mink, the ESAA Advisory Committee and other interested persons and organizations.

Recorded by Mary Ann Pyun

HCSCH:4/17/75

MEETING OF THE EMERGENCY SCHOOL ASSISISTANCE ACT/NON PROFIT ORGANIZATION (ESAA/NPO) PROJECT STAFF AND ADVISORY COMMITTEE WITH MEMBERS OF THE NATIONAL COUNCIL OF EQUAL EDUCATION OPPORTUNITY, APRIL 4, 1975.

The members of the National Council introduced the Session with some assessment of the way in which the ESAA Project has operated throughout the country. It was explained that the 236 million dollars allocated in fiscal year 1975 was primarily to assist local education agencies to comply with court orders to desegregate their schools. There was also some effort to helping Local Education agencies who voluntarily complied with desegregation orders before court orders are issued. As a consequence of ESAA, there was some indication that the condition in Southern schools were a lot better than it was six years ago. The original Act included only fourteen Southern states with gradual expansion until it now includes six minority groups other than Blacks, including American Indians, Portuguese, Hawaiians, Samoans, Orientals, and so forth. The Act was believed to have helped a number of schools system become more responsive to the community. This Act requires a need assessment of actual counts of minorities in order to receive the money and it was believed that this has increased the accountability of expenditure.

Some of Hawaii's difficulties which may be different from mainland included the isolation not only along minority identifications but between native minorities and immigrant minorities. There was an intra-minority isolation of immigrants and this was considered unusual because the immigrant groups that entered the island are not really new to the islands. In particular in Hawaii we have had Filipinos, Koreans, and Chinese and some Samoans for a long time, the recent wave of immigrants did not really introduce a new racial/cultural group into the islands. With this kind of influx, teachers seem to misunderstand the different cultures and there is some culture clash in that area of education. Another problem indicated in Hawaii was that the Orientals who have taken leadership in the education system have adapted a Western value in thinking and non-westernized minority groups face difficulty effectively functioning in the school system which operates with the values of the dominant culture. It is claimed that ESAA money was the only one that forced institutions particularly the schools to look at inter-group relations and the differences among ethnic groups. Without this kind of influence, the school system cannot be left to change themselves.

Questions were raised about the balance between the teachers and the students that they teach - that is, will a predominately minority student body be taught by a predominately majority teaching staff. It was understood that the teacher's union will not allow balance of teachers and student population by the shifting of teacher assignments. There was comment made about waiving the system of balance with role models so that the ethnic role model can provide some understanding of his ethnic group both to students and the teachers.

Suggestion was made to use ESAA money to fund private schools which would demonstrate the way in which education services can be delivered in a different way. In effect, this may create a system of private schools which may end up actually with the development of competing schools systems.

Question was raised about the role of the NPO's and the amount of impact they can make on an institution. Council members were wondering if in fact the NPOs really were making an impact on the institutions or taking the "heat" off the schools so that they would not necessarily have to change.

It was recognized that the ESAA, for example, was dealing with the casualty of the system and there was need to look at some of the root causes of such casualties.

Another concern raised was the fact that the legislature through their budgeting authority actually is the policy making body for the Department of Education. Therefore, the formal policy making body, the Board of Education, actually has little power. Another question raised was the definition of "minorityness" and it was suggested that the mixed child be considered really a category of their own without having to choose one or the other culture label.

In response to a question of what would make the most impact for schools, some suggestions included: (1) provision of Bi-cultural aides in the schools themselves so that the teachers and students would have a role model; (2) Some impact on curriculum change through research and development; (3) Some community input and control of schools. There was some consensus that neither the DOE system would encourage the community input and also the community may split themselves. (4) Another area would be in teacher training, e.g., training a cadre of teachers who after all have the impact on the students; (5) Placing an advocate for minority programs and children within the Department of Education itself; (6) Providing some incentives for schools to hire teachers who have the special gift of working and relating effectively with minority students, i.e., these kids really learn.

The Council members reported that the legal problems which the DOE faced during this application has been cleared and that this now opens up the way for developing an application for DOE to receive approximately two million dollars in ESAA funds.

When the Federal government develops criteria of ethnicity, using the Census Bureau data, some of the ethnic factors prevalent in Hawaii does not become reflected in the data, e.g., the number of Japanese, Koreans, Filipinos, Samoans, is not extractable because these are not ethnic identities recognized or used by the Census Bureau.

There is also some recognition among the group that ESAA and the ethnic problems as associated in the schools really have to do with social economic class, rather than racial ethnic identifications. The projects and programs developed are attempts at developing ethnic pride in the minority group and then leading to integration of races. It is also recognized that there are a number of good things happening in relation to this problem and one of the attempts by the Federal government would be to develop some form of nationwide clearinghouse of information.

NATIONAL ADVISORY COUNCIL
ON EQUALITY OF EDUCATIONAL OPPORTUNITY
1325 G Street N.W. – Suite 710, Washington, D.C. 20005
phone: (202) 724-0221

August 19, 1977

The Honorable Carl D. Perkins
Chairman, House Committee on
Education and Labor
2181 Rayburn House Office Building
Washington, DC 20515

Dear Mr. Perkins:

The Council has compiled all the additional information requested and herewith submit same in the format suggested in your August 11th memo to the Witnesses for National Advisory Councils at the Subcommittee Hearing on August 4th.

I am also taking this opportunity to supply the Committee with my own personal views on the Federal Advisory Committee Act and USOE's recommended consolidation plan as suggested by the last paragraph of your letter.

At the July hearings, the question was asked if the GAO recommendations, which were contained in their report, "Better Evaluations Needed To Weed Out Useless Federal Advisory Committees", were good criteria to utilize in reviewing councils. The comments by the witnesses were generally supportive and some additional viewpoints were presented. I feel, however, that certain features of the issue were not fully illuminated. The uniqueness of charges or mandates given to the Councils by Congress were not stressed by GAO, nor by the witnesses. Without an analysis of this feature, indiscriminate comparisons between councils could result. For example, the National Advisory Council on Indian Education has actual program authority and sign-off (most of us would appreciate this type of authority), while the National Advisory Council for Women's Educational Programs has one mandate that allows them to cross all educational boundaries, although the WEA program, like the Indian educational program, is rather small in dollar appropriations. If NACEEO had the charge to review all educational programs affecting equal educational opportunities for all children (one of the purposes stated by Congress for creating ESAA) instead of its very narrow charge, the activities of the Council, as well as its influence, would be greatly altered.

In conjunction with the mandate or authority given to a council, the size and the complexity of the program or programs should be taken into account. Once again, the councils monitor programs varying in size from $2.5 billion (Title I) to $6 million (WEAP). The Emergency School Aid program in combination with CRA IV is almost $310 million, making it one of the largest fully discretionary programs managed by USOE. ESAA also makes direct grants to nonprofit organizations and is one of the few education programs containing a "resubmit" provision and a complicated scoring system. More importantly, no other education program has the Civil Rights compliance features that ESAA embodies, which are in themselves complex and controversial. This program also requires the direct involvement of the Office for Civil Rights and USOE at both the regional and national levels, further complicating this complex program.

The identity factor must also be considered when viewing councils. One of the GAO recommendations measured a council's effectiveness by the support given to it from the agency. I totally abhor this type of criteria. As everyone knows, there are popular education programs, and not-so-popular programs. In fact, we have various programs supported by educational societies devoted to their particular constituents, each challenging the other for status and funds, such as the Vocational Education, Career Education, Adult Education, Women, Indians, Black. To my knowledge, there is not a group for "desegregated education for all children". The issue of desegregation and racial isolation admittedly is not popular, nor does it easily attract a large number of supportors and champions outside the courtroom. This type of identity makes a council's constituents assume a low profile. Agency support also fluctuates with the Administration's position on desegregation. Therefore, utilizing this criteria is not at all an objective measurement. Financial resources given to a council as an indicator of effectiveness is also ridiculous unless the agency itself, without any Congressional action, established the body. Sometimes the effectiveness of a Council is indirectly proportional to the acceptance and financial support given to it by the agency. This is particularly true of Congressionally established councils dealing with unpopular issues. The agency, as testified to by the statements of Dr. Alfred, does not like interference by councils established by Congress to monitor their activities. If the program that a council is reviewing is administered by a bureau or a large division, the antagonism or the passive, aggressive behavior seems more evident. However, if the program is new, small, and the management of it assigned to a small or new unit, this group may have the tendency to support councils in an effort to utilize the council's influence in gaining a more favorable position in the bureaucratic structure. Finally, as was brought out in the testimony, there is no rhyme or reason for the budgets that councils get. It appears that if you ask for and received $300,000 the first year of existence, you will continue to receive this amount regardless of even zero based budget justification data. Suffice to say, the support a council receives from the agency or outside groups is fraught with hidden variables.

GAO also suggested reports and recommendations produced as a measure of evaluating councils. I would agree with this as long as there were some safeguards. I do not agree that an agency's action or followup on committee reports and recommendations necessarily correlates positively with a council's effectiveness in fulfilling its legislative mandates. Once again, it is a known fact that the agency in general does not cater to the ideas or intrusions by councils created by Congress. Individual program units within agencies also vary in their regard or disregard for councils, and it is these units that actually write the response to council recommendations for agency heads. Perhaps a better indicator would be the "I told you so" approach or what recommendations not acted upon by the agency proved to be necessary or valid in later program history. This process admittedly takes longer but the cause/effect tracking of parties involved is much clearer.

With regard to the whole issue of the agency responsiveness to councils, I agree with the other Executive Directors that the provisions contained within the FACA allowing advisory councils to be financially and administratively controlled by the agencies that have charge of the programs that the councils monitor are akin to a parent-child relationship during adolescence. The regulatory agency can greatly hamper your effectiveness by asking for countless reams of information and by utilizing their in-house policies to constantly frustrate the operational effectiveness of a council. Their functional styles are atypical to that of a small group operation, such as councils. Their personnel problems, time lines, etc., cause delay, loss of valuable information, and increased utilization of council manpower for nonprogram connected activities. The present operational structure can be characterized as a one-way unilateral approach whereby all data is supplied from councils to USOE, while all decisions are made without negotiations with councils to discuss their views. For example, not one council was consulted during USOE's supposedly objective evaluation of councils. The rationale offered in defense of mergers is, therefore, suspect. How could they truly evaluate councils when GAO's report made it sufficiently clear the agencies did not have a truly effective, uniform system for evaluation. How could they utilize "race" as a uniqueness for two councils and "sex identity" for another, and claim to be objective. More than likely, they were attempting to avoid the more politically affluent groups that might bring pressure to bear if they were not given separate identity and influence. This seems to be supported by the fact that supporting rationale for the mergers was based on USOE's own internal bureaucratic reorganization. Under close examination, it is evident that the exceptions to the mergers of councils do not in all cases relate to USOE program management realignment. There is also the question of having and maintaining councils with similar broad charges at the HEW level and at the OE level when the Administration and the agency both profess the "compelling need" philosophy was taken into consideration.

Another problem with the FACA and GEPA is the sections dealing with reports. Additional clarification in this area would be helpful since, according to the legislation as it now stands, councils are to submit their reports to Congress on March 31st of each calendar year with the Commissioner's report (Section 443(a)(2) GEPA), while Section 422(b) and 448(a) of GEPA allow the Commissioner to submit his report on June 30th of each year. It would be beneficial to all parties if Congress had a separate date for councils to submit their program and activities reports, as well as making it clearer that the reports must go to the Committees having jurisdiction over their programs. Sometimes, the Congressional calendar for program input and the input to the Assistant Secretary are such that two different reports could be developed. However, if the time sequences were firmly established, only one full report would be mandatory.

Specifically, the following sections and paragraphs of FACA should be reexamined:

> Section 3(2) - There should be a provision contained in definition of advisory committees allowing for developmental work sessions between staff and more than one council member. The agency interim regulation interpretation is that work session by council subgroups must be open and published in the Federal Register. This really handicaps staff and members in report writing activities that may only be a report for a subcommittee to consider before recommending anything to the full council at its general meetings.
>
> Section 5(4) - The inclusion of language whereby a dollar authorization of appropriations would be required and specific dates for all reports should be spelled out.
>
> Section 7(b)(c) - The Director of the Office of Management and Budget be required to submit to Congress and to advisory councils actions he believes should be taken with respect to advisory councils.
>
> The Director shall consider and transmit to advisory councils recommendations made by agency heads with respect to improving the performance of advisory committees.
>
> Section 10)b) - Working papers and drafts of studies should be deleted under the language of this paragraph. There is a need for internal communication and working papers to be exempt from freedom of information, as is the case with many of the regulatory agency day-to-day working documents.

Sincerely,

Leo A. Lorenzo

LEO A. LORENZO
Executive Director

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Enclosures

bcc: Mr. Jack Jennings
Mr. Christopher Cross

Additional Information for the Hearing Record
National Advisory Council on Equality of Educational Opportunity

In response to the questions posed by Chairman Perkins in his letter of August 11, 1977, requesting additional information for the hearing record, the following information is respectfully submitted:

(1) Total amount of salaries, including all benefits, paid to Council Members for meetings, site visits, other work assignments:

	FY-1976	Trans. Qrtr.	FY-1977 (to date)
Full Council Meetings	$8,000	$2,700	$3,400
FICA	468	158	199
Subcommittee Meetings	$2,500	---	$1,500
FICA	146	---	88
Site Visits	$3,700	---	$5,200
FICA	216		304
*Other Work Assignments	$9,100	$8,900	$9,000
FICA	533	521	527

*Includes compensation paid for research and report writing activities.

(2) Total amount of salaries, including benefits, paid to council staff:

	FY-1976	Trans. Qrtr.	FY-1977 (to date)
*Base Pay, permanent full-time	$46,970.89	$16,207.56	$58,373.92
*Base Pay, full-time (other than permanent)	2,583.28	---	---
*Base Pay, part time	1,665.60	---	---
Consultant staff	---	---	800.00
Sick leave	34.32	113.96	852.08
Normal leave	1,166.16	145.36	1,242.83
Administrative leave	1,813.76	484.32	2,389.44
*LSLP (Lump Sum Leave Payment, perm. full time)	5,089.14	---	---
*LSLP (other than perm. full time)	1,476.16	---	---
CSRA (Retirement)	3,597.44	1,186.57	4,329.12
FICA (Ins. Contribution)	---	---	46.80
FEGLI (Life Insurance)	231.72	87.08	314.85
FEHBA (Health Benefits)	594.43	197.82	664.11

*Includes the three former staff who were working up until the full transition to the new staff was completed.

(3) Total amount expended for travel by council members, including transportation, per diem, and miscellaneous expenses, broken down into travel for meetings, for site visits, and other travel:

	FY-1976	Trans. Qrtr.	FY-1977 (to date)
Full Council meetings:			
Transportation	$7,728.42	$2,288.00	$3,074.14
Per Diem	3,479.53	1,181.49	1,824.59
Misc. Expenses	824.24	220.55	357.24
Subcommittee meetings:			
Transportation	$1,769.30	---	$1,684.16
Per Diem	685.97	---	695.16
Misc. Expenses	164.50	---	285.03
Site visits:			
Transportation	$2,755.58	$ 536.00	$3,301.00
Per Diem	1,785.81	343.70	2,004.41
Misc. Expenses	537.33	57.10	334.54
*Other Travel:			
Transportation	$5,345.47	$3,547.35	$2,590.00
Per Diem	2,198.91	1,356.66	1,244.49
Misc. Expenses	614.00	342.29	355.65

*Includes visits to state departments of education, USOE regional offices of education, regionally sponsored ESAA project directors' conferences, national conferences sponsored by NIE and the Civil Rights Commission, and required staff/council member work sessions.

(4) Total funds expenses for travel by all staff, including transportation, per diem, and miscellaneous expenses, broken down as in (3) above:

	FY-1976	Trans. Qrtr.	FY-1977 (to date)
Full Council meetings:			
Transportation	$1,114.94	---	$1,071.00
Per Diem	771.20	---	824.16
Misc. Expenses	163.26	---	102.65
Subcommittee meetings:			
Transportation	$ 816.00	---	$ 306.00
Per Diem	440.75	---	403.37
Misc. Expenses	102.15	---	93.96
Site visits:			
Transportation	$ 298.40	---	$1,384.00
Per Diem	374.50	---	1,220.49
Misc. Expenses	51.00	---	421.94

	FY-1976	Trans. Qrtr.	FY-1977 (to date)
*Other Travel:			
Transportation	$3,793.65	$1,694.00	$1,822.00
Per Diem	1,777.96	877.48	1,070.36
Misc. Expenses	408.53	208.75	370.13

*Includes visits to state departments of education, USOE regional offices, regional sponsored ESAA project directors' conferences, national conferences sponsored by NIE and the Civil Rights Commission, and required staff/council member work sessions. In FY-1976, it included additional travel in change-over of staff as well as the physical move of headquarters from Portland to Washington, D.C.

(5) List of all contracts let within the past two years, including the names of the contractors, the total amount of each contract, the purposes of the contract, the delivery date for current contracts, and whether the contract was bid competitively:

In the past two years, there have only been two contracts let, both occuring in FY-1976:

1) Contractor: Mr. Ernest Robles

Amount: $800.00

Purpose: At the onset of the change of NACEEO staff, as well as quarters from Oregon to D.C., Mr. Robles, an expert in the area of school desegregation and multi-cultural education, was contracted with to review past NACEEO work plans and reports, and to critique the new Executive Director's work plan in relation to the future activities of the Council. He was to assess the most critical programmatic needs that should be explored and discussed by this Council, or if were not extended, what should be explored by the Assistant Secretary of Education. The information gained through this analysis would form the basis for NACEEO's new operational work plan and it would be utilized in preparing our required 1975 report to the Assistant Secretary. Mr. Robles was to also review the legislative history of ESAA against the legislative history of Title IV of the Civil Rights Act and to prepare a position paper for discussion with the Legislative and Administrative Task Force concerning the similarities, duplications, and differences between the two programs.

The contract was not bid competitively because of Mr. Robles' expertise in the field of desegregation. He had served as a staff assistant to Dr. Jane Mercer in the early Riverside desegregation study sponsored by the State of California, held the first Senior Program Manager's position for Equal Educational Opportunities for the seven state Region IX USOE area, administering Title IV of the Civil Rights Act. Recently, Mr. Robles has been certified as an expert witness in a four-panel group which was to advise the court as to the desegregation plans and relevent educational programs in the San Bernadino School District court case. Mr. Robles also served as the National Director for the League of United Latin American Citizens (LULAC) Education Center and has performed consultant work in the area of school desegregation for the state departments of education in Nevada, California, Arizona, and Massachusetts. He worked with the HEW Office of Civil Rights in their initial investigations of the Southern school districts, developed early desegregation plans, and testified numerous times before the courts.

2) Contractor: Maxine Deberry

Amount: $1,500

Purpose: To provide Dr. Jacquelyne Jackson, Chairman of NACEEO Subcommittee on Evaluation, with technical assistance of a research nature as part of the development of the official NACEEO Evaluation Report. Essentially, the work that was required was that of data collection, summarization, and collation. Extensive research and review of the existing literature would have to be accomplished in order to provide the Evaluation Subcommittee with the appropriate historical references and criterion data base. Most reports dealing with evaluation, especially federal program evaluation, are lengthy and conclusions as well as recommendations must be placed within the proper context yet summarized in such a manner as to expedite comparative analysis. The contractor was required to work at least an equivalent of 4 full weeks in order to comply with the stringent demands of reviewing the research reports available on not only the ESAA program, but other programs that had an interface relationship with the EEO mission. Dr. Jackson had estimated that no fewer than 30 technical reports would have to reviewed in depth and 30 written summarizations of the results and methodology utilized would have to be prepared for her review.

The contract was not bid competitively because the Chairman of the Subcommittee had strongly recommended the contractor as being uniquely suitable for fulfilling the terms of the contract. Chairman Jackson had had occasion to work with this individual on other research projects requiring the technical assistance skill needed for the project. The contractor's accessibility not only to Dr. Jackson, but also to the excellent research facilities at Duke University (Dr. Jackson's professional affiliation) was a strong argument for a sole source, non-competitive award.

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